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Witness: Donald J. Scacco Jr., Digaunto Chatterjee, Douglas P. Horton, Lavelle A. Freeman, Elli Ntakou, Jared A. Lawrence, Jessica B. Cain, Andrew C. Belden, Marc J. Richards and Clare B. Connolly
Request from: Office of Consumer Counsel

Question:

Exhibit CLP-ELP-3 Please identify each Metric and Scorecard adopted in the final Docket No. 21-05-15RE02, Performance Evaluation System that is not included in the Company's proposed performance portfolio. For each omitted Metric or Scorecard, please explain why the Company did not propose to include it and identify any analysis, data, or other information supporting that determination.

Response:

For clarification, the Company's response below is provided in reference to the Proposed Final Decision for Docket No. 21-05-15RE02, received on July 27, 2026 (about two weeks after the Company filed its application to amend rates). The timing of the final decision for Docket No. 21-05-15RE02, has not been determined.

The Company's proposed Performance Incentive Mechanisms (PIMs) and metrics are based on PURA's PBR framework, so far as it was determined in the RE02-PFD, subject to certain modifications that the Company is proposing for PURA's consideration. The Company's proposal prioritizes implementation of focused PIMs tailored to drive meaningful performance during the PBR term.

Of the 38 Metrics, Scorecards, and potential PIMs presented in the RE02-PFD, the Company has identified only one PIM that was not included in the Company's proposed PBR evaluation framework (NWS Shared Savings). In addition, there are 22 Reported Metrics and 10 Scorecard Metrics that the Company has omitted.

Please refer to Q-OCC-439, Attachment 1, for a detailed list of the metrics identified in the RE02-PFD, with reference to whether the metric was also included in the Company's proposed PBR evaluation framework.

The Company previously expressed concerns regarding the design of the non-wires solution (NWS) Shared Savings Mechanism included in Docket No. 21-05-15RE02 (Eversource Written

Comments filed March 27, 2025).[1] The NWS analysis process established through Docket No. 17-12-03RE07 and Docket No. 24-08-08, is slanted in its design to favor implementation of non-wires alternative (NWA) solutions, which is accomplished by the inclusion of a generic "societal benefits" value in the benefit-cost analysis. The required analysis and inclusion of hard-to-quantify societal benefits has a strong potential to result in the implementation of a higher cost NWA solution that would ***increase*** utility rates as compared to a wires solution, while the benefits that would be counted in the customer column are theoretical and illusive in terms of quantification and justification. Under the NWS Shared Savings Mechanism, customers would pay an incentive to the Company, on top of the higher-cost NWA solution, based on 25% of the "benefits" of the NWA solution, including societal benefits, which is a construct that is not in the interests of customers.

The Company's objective is to ensure that rates it charges to its customers are reasonable and appropriate in terms of reflecting only those costs that are necessary to provide safe and reliable electric service. Particularly in light of the ongoing concerns regarding energy affordability, the Company does not support a mechanism that will further increase customer rates more than necessary. In addition, PIMs should be designed to encourage the Company to undertake an action that is within its control for the benefit of customers. Due to the design of the NWS analysis process, the Company does not have any manner of influencing the evaluation process and therefore, this mechanism is not appropriately designed as a PIM.

With respect to the scorecards and metrics, the Company's metric proposal seeks to avoid
(i) duplication of information that may already be provided in other existing compliance filings;
(ii) establishment of interpretive targets that overlook variability in investment spending; or
(iii) inclusion of metrics for conduct or outcomes that are beyond the Company's control.

As previously addressed in Written Exceptions in Docket No. 21-05-15RE02, in response to the first Proposed Final Decision, the Company does not support the scorecards and metrics below for the following reasons:

- Peak Demand – This scorecard is an inaccurate and inappropriate basis for measuring the electric system's efficiency given that many factors that would influence peak demand are entirely outside of the Company's control (e.g. weather).
- Beneficial Electrification Data - The Company does not support this metric since the Company's role in supporting EV adoption is limited to preparing the grid for EV charging stations. Customer adoption of EVs is subject to factors that are outside of the Company's

[1] https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/923724b7d42120e485258c5a006a8f70?OpenDocument

control (e.g. the EV market and customer conduct). Further, the Company does not track the EV registrations of its customers, or heat pump installations of all customers.

The Company also previously discussed its opposition to the following metrics in its Written Comments filed March 27, 2025:

- Power Restoration After Major Storm Metric: The Company opposes this metric for the fundamental reason that a storm's path, and which towns are impacted, is not within the EDC's control. The Company responds to storm events in compliance with a PURA-approved Emergency Response Plan ("ERP") that follows law and regulation.

- Environmental Justice Reliability Metric: For similar reasons, relating to storm restoration practices and circumstances outside the Company's control, the Company opposes any metric on power restoration after major storms. In addition, such reporting would be duplicative with existing reporting post-major storms as well as with the Town Reliability Scorecards that the Company produces annually.

Separate from the written exceptions and comments, the Company does not currently have the data or requirements to support the following items:

- Distribution System Losses: Although the Company supports the proposed methodology, it does not currently have models, resources, or processes in place to accurately calculate Technical Losses as envisioned in the RE02-PFD.

- DER Services (specific to the sub-metric for Total MW Enrolled - EV Managed Charging): The Company does not have a measure of MW enrolled because managed charging is a program to shift customer EV charging behavior to off-peak periods. The Company does not collect data on the EV charging demand at a residence.

- Time-Varying Rate (TVR) (specific sub-metric for Amount of Load Reduced by Customer Class as a Result of TVR Adoption): There is neither a baseline nor a method established to determine the amount of load reduced by Customer Class due to TVR adoption.

Regarding AMI-related metrics proposed in Docket 17-12-03RE02 (Equitable AMI and Customer Data Engagement), please refer to Exhibit CLP-AMI-2, at 87-89, for the success measures proposed as part of the Company's AMI Deployment and Implementation Plan.