Date Filed: November 17, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(LEGAL AND PROFESSIONAL SERVICES) Indicate whether the Company is seeking to recover any expenses incurred in connection with any Freedom of Information (FOI) requests, including any proceedings before the Freedom of Information Commission (FOIC). If so, indicate what schedules and line items such costs are reported in and provide the relevant FOIC docket number or FOI tracking number.

Response:

The Company has included in its Legal Service Expense Schedule C.3.20 its costs associated with Freedom of Information (FOIA) requests associated with a CT PURA Appeal and Court Complaint. The law firm Cowdery Murphy provided these state regulatory legal support services in the 2025 Test Year. The Company has included this cost in its test year legal expense information as the Company expects to have additional FOIA requests when appropriate in future rate years. These types of legal expenses are appropriate to include as a representative amount of a legal expense for future rate years.

Law Firm	Legal Matter Number	Legal Matter Name	Docket Number FIC	2025 Expense
Cowdery Murphy	202400241	Eversource Appeal from CT PURA to CT Freedom of Information Commission	2024 – 0842 2025 – 0816 2025 – 0291	$ 190,899

Date Filed: November 19, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:
(LEGAL EXPENSE) Application, Sch. WP C-3.20. Provide:

a. A description of what is included in each line item of this schedule, including a detailed description of how amounts are charged to the various accounts (e.g., how are costs charged to Claims & Litigation vs. Corporate); and

b. for allocated amounts included in the Test Year rolled forward to the Rate Year, the method of allocation and calculation for amounts charged to the Company.

Response:

a. Exhibit CLP-REVREQ-2, Schedule C-3.20 and Work Paper C-3.20 include legal and legal-related expenses that are necessary to conduct the business of providing service to electric customers, including: Claims & Litigation, Corporate, Employment, Federal Regulatory and State Regulatory. An explanation of each of these areas is as follows:

Cost Category	Description
Claims & Litigation	These legal costs are necessary for dispute resolution, credit and collections and litigation matters arising in the normal course of business.
Corporate	Includes all corporate compliance, certification, training and legal administration; as well as legal support for all corporate, financing, SEC filings, and shared services areas related to sustainability, environmental, real estate, procurement, energy supply and IT. All of these legal matters arise in the normal course of providing electric service to customers.
Employment	Includes all labor, employment, and employee benefit matters, as a necessary feature of having employees to serve electric customers.
Federal Regulatory	Legal support for all federal regulatory matters, necessitated by the need to provide electric service to customers.
State Regulatory	Legal support for all state regulatory matters, necessitated by the need to provide electric service to customers.

Legal costs are categorized and charged to the applicable accounting work order and identified in a legal service cost center based on the nature and subject matter of the legal services provided. For example, expenses associated with litigation, bankruptcy claims and other legal disputes are recorded within Claims & Litigation, while expenses related to corporate governance and SEC filings are recorded within the Corporate classification.

b. In accordance with the Company's cost charging guidelines, costs are first directly charged to an entity where possible. If costs cannot be directly charged to an entity the Company uses causal allocations to assign costs to the different entities. If neither direct charging nor causal allocations are applicable, the Company uses a common allocator to assign the costs to different entities. Consistent with those guidelines, many of the legal costs are directly charged to CL&P. The remaining costs are initially incurred at the service company and based on the accounting work order (and rate code within that work order) subsequently allocated to the specific operating companies.

Please refer to EOE-066, Attachment 1, for the ESC Cost Allocation Manual that includes the cost allocation approaches and methodologies. Please refer to the table below for a breakdown of the Test Year and Rate Year costs by allocation methodology.

Table 1

Allocation Methodology	**Test Year Amount**	**Rate Year Amount**
Direct Charged	$ 4,933,957	$ 4,862,638
Number of Customers	$ 6,018	$ 6,406
Customer Handle Time	$ 2,261	$ 0
Labor	$ 49,356	$ 48,258
Gross Plant Assets	$ 51,617	$ 54,943
Common	$ 141,984	$ 149,213
Total	**$ 5,185,193**	**$ 5,121,458**

Date Filed: November 20, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Public Utilities Regulatory Authority

Question:

(LEGAL EXPENSE) Application, Sch. WP C-3.20. Provide the following information in an unlocked Excel workbook with formulas intact for all expenses included in the Test Year, the pro forma adjustments, and the Rate Year reported in each line item in Schedule WP-3.20 (i.e., Claims & Litigation, Corporate, Employment, Federal Regulatory, and State Regulatory), with each line item in a separate unlocked Excel worksheet:

a. the name of the entity that charged the Company for its services;
b. for each entity listed in subpart (a), a detailed description of each matter on which the entity worked; and
c. for each matter listed in subpart (b),
    i. a detailed description of the expenses incurred;
    ii. the docket number of the matter (e.g., federal regulatory energy commission docket number, PURA docket number, FOIC docket number, FOI tracker, and or Superior, Appellate, or Supreme Court docket number), if applicable;
    iii. whether the matter has been resolved and, if not, a brief timeline of events expected to occur in the Rate Year; and
    iv. for allocated amounts, the calculation of amounts charged to the Company.

Response:

Please refer to PURA-003, Attachment 1, which provides the entity name charging for its services; identified legal expense category; cost allocation method and allocation factor; legal work performed; FERC, CT PURA, FOIC or court docket number if applicable; legal matter status; and Rate Year amount; proforma adjustments; Test Year proforma adjustments; Rate Year adjustments and Rate Year expense.

Date Filed: November 09, 2026

Witness: Elizabeth N. Jones
Request from: Public Utilities Regulatory Authority

Question:

(FEE FREE PROGRAM) Application, Sch. C-3.15.

a. State whether the Company uses a payment aggregator.
b. If the Company uses a payment aggregator, provide:
    i. the date on which the Company first started using the payment aggregator;
    ii. the amount paid monthly to the payment aggregator;
    iii. a copy of the Company's contract with the payment aggregator; and
    iv. the amount of money the Company has saved per month by using the payment aggregator since implementing its services.
c. If the Company does not use a payment aggregator, explain why.

Response:

a. No, the Company is not contracted with a payment aggregator for the service of payment aggregation.

b. Not applicable.

c. Neither the Company nor its customers would benefit if the Company were to contract with a payment aggregator. Payment aggregators are currently used by Eversource customers seeking other services offered by the payment aggregators, and these customers' ancillary use of the payment aggregator for bill payment has no cost to the Company or other customers. Additionally, the Company already offers multiple payment options to customers at no cost.

Date Filed: November 09, 2026

Witness: Elizabeth N. Jones
Request from: Public Utilities Regulatory Authority

Question:

(FEE FREE PROGRAM) Application, Sch. WP C-3.15. Discuss what benefits the Company has seen with the implementation of the Fee Free Program and how the Company quantifies such benefits.

Response:

The goal of removing the fee for residential credit and debit card payments was to eliminate a high customer dissatisfier and related complaints. The Company advocated for removal of the fee for credit and debit card payments for residential customers because it was a dissatisfier, caused complaints, and residential customers do not expect to have to pay a fee.

Since the removal of the fee, residential customers paying by debit or credit card have benefited from an improved customer experience that aligns with customer expectations of not incurring a fee for those payment methods. The implementation has been successful in achieving its objectives of removing a customer dissatisfier and reducing customer concerns related to debit and credit card payment fees. Since 2022, fewer than one percent of residential electric customers have expressed dissatisfaction related to credit or debit card fees. In many of these instances, customers either had not attempted to use a credit or debit card since the fee was eliminated or mistakenly believed a fee had been charged when no fee was assessed. Overall, customer feedback indicates that the elimination of the fee has been well received and has met customer expectations.

Date Filed: November 09, 2026

Witness: Elizabeth N. Jones
Request from: Public Utilities Regulatory Authority

Question:

(FEE FREE PROGRAM) Application, Sch. WP C-3.15. Provide the metrics the Company uses to track the success of the Fee Free Program.

Response:

Please refer to the Company's response to PURA-005[i].

Prior Referenced Response:

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[i] PURA-005 Question:

(FEE FREE PROGRAM) Schedule WP C-3.15. Discuss what benefits the Company has seen with the implementation of the Fee Free Program and how the Company quantifies such benefits.

PURA-005 Response:

The goal of removing the fee for residential credit and debit card payments was to eliminate a high customer dissatisfier and related complaints. The Company advocated for removal of the fee for credit and debit card payments for residential customers because it was a dissatisfier, caused complaints, and residential customers do not expect to have to pay a fee.

Since the removal of the fee, residential customers paying by debit or credit card have benefited from an improved customer experience that aligns with customer expectations of not incurring a fee for those payment methods. The implementation has been successful in achieving its objectives of removing a customer dissatisfier and reducing customer concerns related to debit and credit card payment fees. Since 2022, fewer than one percent of residential electric customers have expressed dissatisfaction related to credit or debit card fees. In many of these instances, customers either had not attempted to use a credit or debit card since the fee was eliminated or mistakenly believed a fee had been charged when no fee was assessed. Overall, customer feedback indicates that the elimination of the fee has been well received and has met customer expectations.

Date Filed: November 20, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray and Elizabeth N. Jones
Request from: Public Utilities Regulatory Authority

Question:
(FEE FREE PROGRAM) Application, Sch. WP C-3.15. Provide:

a. a narrative, with assumptions, regarding the $98,000 normalization proforma adjustment, including the calculation of such adjustment;
b. a detailed description of the $83,000 in projected savings, and include any documentation and calculations to support such savings;
c. an explanation regarding whether the Company has achieved savings in the Fee Free Program in previous years and if not, why savings are only projected to occur in the Rate Year;
d. an explanation regarding how the Company arrived at $2,028,000 credit and debit card transactions in the Rate Year;
e. documentation to support the $1.53 fee for each credit and debit card transaction in the Rate Year; and
f. an explanation of and documentation to support the 3.39% sales tax rate.

Response:

a. Please refer to PURA-007, Attachment 1, for a calculation of the normalization pro forma adjustment. The Company normalized the Test Year by removing 2024 Fee Free costs that were paid in 2025 and including 2025 Fee Free Costs that were paid in 2026. In addition, the Company corrected the sales tax calculation to remove portions not attributable to CL&P and removed unvouchered liabilities and unvouchered reversals.

b. The projected savings represent the amount saved from customers migrating to the Fee Free program from direct debit and payment by mail. Please refer to PURA-007, Attachment 2 CONFIDENTIAL, for a calculation of how the savings were derived.

c. The Company achieved offset savings from customers who migrated from using another payment channel to paying via credit or debit card after the convenience fee was removed. For example, if a customer previously paid via electronic check, the Company paid a per-transaction fee to its electronic check payment processing vendor. If that same customer chose to pay using credit or debit card after the convenience fee was removed, the Company would pay a per-transaction fee to its credit/debit card vendor instead of its electronic check payment processing vendor.

d. The Company used monthly payment volume projections for July 2027 through June 2028 to estimate 2.028 million Fee Free transactions over that period. Please see PURA-007, Attachment 2 CONFIDENTIAL, for a calculation of the Company's payment volume.

e. To view the full contract, please refer to OCC-139, Attachment 1 CONFIDENTIAL. For details specific to this question refer to page 62, for the Client-Fee Pricing Matrix.

f. The amount of 3.39% is the direct pay sales tax rate for Eversource Energy Service Company as the bill is a Service Company bill and is subject to sales tax at the Service Company rate. Please refer to PURA-007, Attachment 3 CONFIDENTIAL, for the support behind the sales tax rate.

Date Filed: November 10, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray and Elizabeth N. Jones
Request from: Public Utilities Regulatory Authority

Question:

(FEE FREE PROGRAM) Discuss the differential between Fee Free Program fees collected through distribution rates and program fees assessed by and paid to the vendor.

Response:

The Company is billed the credit card fee that is applicable when a customer pays their electric bill with a credit card. Those fees are offset by the revenues authorized in the Company's last base distribution rate proceeding in Docket No. 17-10-46. In accordance with the 2018 Rate Settlement from Docket No. 17-10-46, the Company has tracked the actual expenses to revenues received and deferred any over or under-recoveries. Please refer to Exhibit CLP-REVREQ-1, pages 54 through 57, for a discussion of the fee free Deferral.

Please also refer to line 48 of B-6.2 in Exhibit CLP-REVREQ-2 for the test year actual and rate year projected over-recovery balances net of accumulated deferred income taxes. Please refer to C-3.15 and WP C-3.15 in Exhibit CLP-REVREQ-2 for the proposed rate year amount to be recovered annually in base distribution rates. The current amount set in rates is $2,654 million as part of the 2018 Rate Settlement in Docket No. 17-10-46 (2018).

Date Filed: November 09, 2026

Witness: Elizabeth N. Jones
Request from: Public Utilities Regulatory Authority

Question:

(FEE FREE PROGRAM) Provide:

a. a list of residential customer fees assessed for bill payments made by means other than credit or debit cards (e.g., fees for providing payment by check, if applicable, Apple Pay, Google Pay, etc.); and
b. a list of non-residential customer fees assessed for bill payments, including fees for bill payments made by credit and debit card and payment by check, and whether the customer is charged the fee assessed.

Response:

a. Each payment-processing vendor charges a fee per payment for the payment methods they process.

   Payment processing vendor fees are *not* directly assessed to a residential customer for payments made via the following:

   - For electronic check payment processing, the vendor's per-transaction fee is $0.055.
   - For paper check payment processing, the vendor's average per-transaction fee is $0.1274.
   - For walk-in payment location processing, the vendor's per-transaction fee is $0.85. The Company is contracted to offer more than 70 no-fee walk-in locations in Connecticut, including all locations in Connecticut's top 10 highest hardship towns[1] as ordered by PURA in Docket No. 21-07-01.

   Payment processing vendor fees *are* directly assessed to residential customers at the remaining walk-in payment locations and the fee is up to $1.50.

[1] Top 10 highest financial hardship towns are Waterbury, Hartford, Meriden, New Britain, Bristol, East Hartford, Torrington, Stamford, New London and Danbury.

b. Each payment processing vendor charges a fee per payment in the payment methods they process.

Payment processing vendor fees are *not* directly assessed to a non-residential customer for payments made via the following:

- For electronic check payment processing, the vendor's per-transaction fee is $0.055.
- For paper check payment processing, the vendor's average per-transaction fee is $0.1274.
- For walk-in payment location processing, the vendor's per-transaction fee is $.85. The Company is contracted to offer more than 70 no-fee walk-in locations in Connecticut, including all locations in Connecticut's top-10 highest hardship towns[2] as ordered by PURA in Docket No. 21-07-01.

Payment processing vendor fees *are* directly assessed to non-residential customers payments made via the following:

- At the remaining walk-in payment locations, the fee is up to $1.50.
- For credit and debit card payment processing, the vendor's per-transaction fee is $11.40 for every $1,500 payment increment.

[2] Top-10 highest financial hardship towns are Waterbury, Hartford, Meriden, New Britain, Bristol, East Hartford, Torrington, Stamford, New London and Danbury.