STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	:	DOCKET NO. 26-05-10
	:	October 6, 2026

BUREAU OF ENERGY AND TECHNOLOGY POLICY'S FIRST SET OF INTERROGATORIES

The Department of Energy and Environmental Protection (DEEP), Bureau of Energy and Technology Policy (BETP) requests the responses to the attached questions by ***October 27, 2026*** Interrogatories BETP-1 to BETP-62 are directed to the Connecticut Light and Power Company d/b/a Eversource Energy (Eversource).

INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

a. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g. documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original document.
b. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

c. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.
d. Provide English translations of all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such a statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional new material or information responsive to any interrogatory or request for production, or you discover that nay response you provide herein was totally or partially incorrect, or though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify, or correct your responses to each of these interrogatories and production throughout until a final decision is adopted by the Authority in this Docket.

INTERROGATORIES

Interrogatories BETP-1 through BEPT-62 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

BETP-1. (PBMRP) Refer to Exhibit CLP-ELP-1 pp. 89–90 (testimony pp. 86–87). Please provide an estimated revenue requirement forecast under the Company's proposal if all Performance-Based Multi-year Rate Plan ("PBMRP") components are implemented at the

Company's forecasted levels and assumptions. The analysis should include a cost recovery break-out for each PBMRP component or subcomponent if the mechanism contemplates multiple expense types. Provide a brief discussion of the calculations and assumptions used or note where support for certain forecasted components have been previously provided (e.g., Response to EOE-156).

BETP-2. (PBMRP) Refer to Exhibit CLP-ELP-1 pp. p. 102. Please clarify the Company's statement that "Any such investment would instead remain subject to review and consideration in a subsequent base rate proceeding or successor PBMRP Term."

BETP-3. (PBMRP) Refer to Exhibit CLP-ELP-1 at p. 65. Refer to Figure 7 CL&P Capital Funding Requirements (2027-2031). Please explain whether the Company proposes to cap the capital cost recovery mechanism at the TSP Plan capital funding requirements by major expenditure category or the total.

BETP-4. (PBMRP- Z factor) Refer to Exhibit CLP-ELP-1 p. 99. Define (1) State Initiated Cost Change; (2) Federally Initiated Cost Change; (3) Regulatory Cost Reassignment; and (4) Externally Imposed Accounting Rule Change as it pertains to Exogenous Events in the Company's proposal. For each category, provide specific examples of potential events the Company expects would and would not qualify for recovery as an Exogenous Event.

BETP-5. (PBMRP Z- factor) Refer to Exhibit CLP-ELP-1 p. 99. Discuss whether the proposed Z-factor would apply only to increases and decreases in distribution costs resulting from qualifying exogenous events.

BETP-6. (PBMRP Z- factor) Refer to Exhibit CLP-ELP-1 pp. 24-25, 99. Discuss any interaction of the proposed PBMRP and the Leadership Panel's discussion of enabling utility ownership of generation.

BETP-7. (PBMRP Z- factor) Refer to Exhibit CLP-ELP-1 pp. 22-24, 99. Discuss any interaction of the proposed PBMRP and the Comprehensive Independent Integrated Resource Plan ("CIIRP") stakeholder process described by Leadership Panel.

BETP-8. (PBMRP Z- factor) Refer to Exhibit CLP-ELP-1 pp. 24-25, 99. Discuss any interaction of the proposed PBMRP and the Leadership Panel's discussion of opportunities to coordinate upgrades to the gas distribution and transmission systems to increase firm gas supply

in southeast Connecticut, facilitating either the buildout of a new natural gas combined-cycle generation unit or firming up an equivalent amount of gas supply for existing generation.

BETP-9. (PBMRP Z- factor) Refer to Exhibit CLP-ELP-1 p. 100. For the purposes of determining the threshold significance of 0.5 percent of CL&P's total distribution revenue, please explain whether that threshold would be fixed at the Company's allowed base distribution revenue for the Rate Year, the current annual base distribution revenue inclusive of PBMRP Adjustments, or some other amount.

BETP-10. (PBMRP Z- factor) Refer to Exhibit CLP-ELP-1 p. 100. Compare and contrast the Company's PBMRP proposal with the performance based ratemaking mechanisms allowed for Eversource's electric operations in other jurisdictions.

BETP-11. (Utility Owned Generation) Refer to Exhibit CLP-ELP-1 p. 21-24. Please explain the Company's position on its legal authority to own the generation it is proposing in its CLP-ELP-1 testimony?

BETP-12. (DERs) Has the Company conducted a retrospective analysis on the costs avoided by DERs against the costs incurred for integrating and supporting DERs? If so, please provide the results.

BETP-13. (Historic Capital Investment) Please provide by total dollars per year the amount spent on annual capital investments for each year from 2005 –2025 for: (1) distribution and (2) transmission. Are capital investments primarily constrained by capital availability or system needs?

BETP-14. (SHARE) Refer to Exhibit CLP-TSP-3 p. 47-48. Are any of these costs related to the Shared Hosting for Advancement of Renewable Energy (SHARE) proposal? If yes, please provide a breakdown in each category listed of SHARE-related costs and non-SHARE-related costs.

BETP-15. Refer to Exhibit CLP-TSP-3 p. 102. Please provide project details about the 39.1 MW of DER in the queue that is assumed to come online within the next three years, including but not limited to:

a. technology type;

b. size;
c. date entered the interconnection queue;
d. and any relevant ratepayer-funded incentive program the project may be participating in (e.g. Nonresidential Renewable Energy Solutions, Shared Clean Energy Facilities, Energy Storage Solutions, etc.)

BETP-16. Refer to Exhibit CLP-TSP-3 p. 143. Please describe how the two substations from the list of eight substations identified in Docket No. 22-06-29RE01 were chosen over the others, and describe how the one additional substation was chosen over others identified in Docket No. 22-06-29RE01 for the Shared Hosting for Advancement of Renewable Energy (SHARE) proposal.

BETP-17. Refer to Exhibit CLP-TSP-3 p. 145. For each of the eight proposed and potential substations to participate in the Shared Hosting for Advancement of Renewable Energy (SHARE) proposal, please provide project details about the DER in queue, including but not limited to:

a. technology type;
b. size;
c. date entered the interconnection queue;
d. and any relevant ratepayer-funded incentive program the project may be participating in (e.g. Nonresidential Renewable Energy Solutions, Shared Clean Energy Facilities, Energy Storage Solutions, etc.)

BETP-18. How does the SHARE proposal in this filing differ from the PURA proposal in Docket No. 22-06-29RE01? How does the Company's proposal reduce costs to all ratepayers?

BETP-19. Has the Company considered the potential impact of Section 16 of Public Act 26-127 on the Shared Hosting for Advancement of Renewable Energy (SHARE) proposal? If yes, please explain the Company's analysis and understanding of these potential impacts.

BETP-20. Refer to Exhibit CLP-TSP-3 p. 103-105. Please describe the process Eversource used to estimate the cost for the battery storage projects.

BETP-21. Refer to Exhibit CLP-TSP-3, pp. 68–70. Please describe how the EPRI Power Transformer Expert System ("PTX") health-index results are used to select and prioritize transformer replacements. Please provide a summary table, by year for 2027–2031, showing the

number of transformers proposed for replacement, the applicable health-index range, estimated replacement cost, and any other principal factor supporting replacement. Identify any material instances in which the proposed replacement order differs from the PTX ranking and explain why.

BETP-22. Please provide a reconciliation, by year for 2027–2031 and by major program category, of the approximately $3.985 billion Targeted System Performance Plan to the Company's capital-additions forecast. Please identify the following in this reconciliation:

a. forecasted expenditure;
b. expected in-service amount;
c. primary investment driver;
d. and proposed recovery mechanism for each category.

Please identify which amounts are authorized, under design, conceptual, or contingent on a future event. Separately identify IT, Facilities, and Basic Business capital expenditures excluded from the engineering plan.

BETP-23. Refer to Exhibit CLP-TSP-1, pp. 33–36 and 67–71; Exhibit CLP-TSP-2, pp. 45–48; and Exhibit CLP-TSP-3, pp. 91–92 and 136–139. Please describe the Company's current and planned use of artificial intelligence and machine learning technologies in Connecticut. In the Company's response , please include the following:

a. whether the use case is currently in practice, being piloted, or has been proposed for future development;
b. the expected benefit to customers;
c. the anticipated implementation timeline;
d. and any significant data, cybersecurity, workforce, or other foreseeable barriers to implementation.

BETP-24. Refer to Exhibit CLP-TSP-1, pp. 33–36 and 67–71; Exhibit CLP-TSP-2, pp. 45–48; and Exhibit CLP-TSP-3, pp. 91–92 and 136–139. Did the Company use any artificial intelligence or machine learning in development of the proposed TSP? If not, explain whether and when the Company expects to incorporate those capabilities into its planning process.

BETP-25. Refer to Exhibit CLP-TSP-3. For each proposed substation or distribution-capacity project identified, please briefly identify the principal alternatives considered, including:

a. load transfers;
b. equipment uprating;
c. storage;

d. demand response;
e. flexible interconnection;
f. or other non-wires alternatives.

Please provide the estimated cost, implementation timeline, and principal reason each alternative was rejected or not selected. If no alternatives analysis was performed, explain why.

BETP-26. (Integrated Distribution System Plan) Refer to Exhibit CLP-TSP-1, Exhibit CLP-TSP-1, p. 69. Please explain further the Company's statement that "the Companies have provided their version of the IDSP with reduced scope". Provide specifics on where the Company's TSP differs in scope from the Authority's Version in Docket No. 21-05-15RE03.

BETP-27. (Substation Transformers) Refer to Exhibit CLP-TSP-1, Exhibit CLP-TSP-1, pp. 55-56. Please explain the Company's rationale for targeting an average age of approximately 35 years when substation transformers typically have a design life of 40 years. Furthermore, please define "design life" and discuss whether there are any actions that can be taken to extend the life of these assets and whether the Company has taken such actions.

BETP-28. (Load/DER Forecast) Refer to Exhibit CLP-TSP-1, Exhibit CLP-TSP-1. Please provide all assumptions the Company relied on for its TSP capacity planning, including historical and forecasted substation and circuit peak loads, specific large customer changes, planned circuit changes and estimated growth and retirement of distributed energy resources and energy efficiency.

BETP-29. Refer to Exhibit CLP-TSP-1 pp. 29-30. The Company implies a change in the load growth pattern that is changing the investment needs. Please provide examples of this and identify, if possible, what is causing the growth and if the growth is happening in areas with a definable set of characteristics.

BETP-30. Refer to Exhibit CLP-TSP-1 pp. 29-30. Has the Company raised this change in load growth pattern and the cost implications in a proceeding before the Authority in any of the Equitable Modern Grid Dockets and annual dockets that were the outgrowth of those dockets. Also include in your response, an explanation of:

a. the cost implications to non-participating customers as a result of the phenomena described;
b. are the costs described here included within the interconnection costs of the DERs that are interconnecting in these areas;

c. is whether or not the Company is proposing that the costs described here should be borne by all ratepayers or the interconnecting customers.

BETP-31. Refer to Exhibit CLP-TSP-1 p. 32. Please provide additional information regarding the specific electrical system limitations that the Canadian Company required. Please explain what upgrades were needed and the costs associated with the necessary upgrades?

BETP-32. Refer to Exhibit CLP-TSP-1 p. 34. The Company's model that includes the past 20 years of upgrades and shows the benefits of every dollar invested in terms of SAIDI and SAIFI. Has the Company identified any trend on reliability improvement and money invested? Specifically, are there diminishing returns on investment at a certain point of reliably? Are there any inflection points?

BETP-33. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-2 p. 88, Exhibit CLP-TSP-4. Did the Company submit Exhibit CLP-TSP-4 as a compliance filing to Order No. 12 on Docket No. 17-12-03RE08, on or before the deadline of October 7, 2022? If not, please explain why.

BETP-34. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4. In the Final Decision of Docket No. 17-12-03RE08, on p. 79, the Authority instructed the Company to consider the findings of three climate change reports that were specific to Connecticut. Can the Company explain how these three reports were consulted and, if at all, incorporated into the findings of this exhibit?

BETP-35. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4 p. 13,. Please define and explain an "optimal climate adaptation plan," and describe how this plan can be developed and implemented within the Company's estimated 18-month schedule from approval?

a. Can the Company explain why Phase 3 of the Vulnerability Assessment remains incomplete as of the date of this interrogatory issuance?

BETP-36. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4. Did the Company review the 2025 Connecticut Grid Resilience Assessment, issued by the University of Connecticut Eversource Center, as part of its preparation of the Climate Vulnerability Study?

a. Did the Company participate in the development of the 2025 Connecticut Grid Resilience Assessment?

BETP-37. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4. Did the Company consult UConn Connecticut Institute for Resilience & Climate Adaptation's (UConn CIRCA) maps to assess potential future coastal flooding. If no, please explain why.

BETP-38. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4 p.45. Please explain the methodologies used and why these approaches were taken in the "Engineering Risk Assessment" section of the Company's Climate Vulnerability Assessment. Additionally, please identify the sources and resources that behind the methodologies chosen in this study.

BETP-39. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4 p.58. Please identify the sources and resources used to support the "Sensitivity Analysis."

a. Please explain the difference between the Risk MAP and Flood Insurance Rate Maps.

BETP-40. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4 pp. 28, 50-53. Why did the Company not include extratropical cyclones in the analysis of storm surge?

a. Did the Company base storm surge levels on the Saffir-Simpson classification?
b. Did the Company consider other factors that impact storm surge levels not captured by Saffir-Simpson? If yes, please describe the factors and explain why these factors were considered.

BETP-41. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4 p. 59. Please provide datasets, sources, and resources used to record the wind speed data and please include the following:

a. Exact location and gauge height;
b. maintenance and calibration records;
c. any additional relevant data that supports the records for these wind speeds.

BETP-42. (Climate Change Vulnerability Study) Refer to Exhibit CLP-TSP-4 p. 29-44. Please explain the goal of the two case study extreme event scenarios and how they relate to understanding the Company's climate change vulnerability.

BETP-43. (TVR interim or bridge offerings) Refer to Exhibit CLP-AMI-1, pp. 11-12 n.1, and Exhibit CLP-AMI-2, pp. 80-82. Please identify the residential and commercial rate offerings the Company expects to propose as interim or bridge solutions by the October 1, 2027, deadline in Conn. Gen. Stat. Sec. 16-243n and explain how each proposal will address:

a. default enrollment with an opt-out;
b. applicable retail rate components;
c. seasonal and on-peak/off-peak design;
d. customer protections;
e. customer education; and
f. empirical support for the rate differential.

BETP-44. (TVR interim or bridge offerings) Refer to Exhibit CLP-AMI-1, pp. 11-12 n.1, and Exhibit CLP-AMI-2, pp. 80-82. Provide the process that Eversource anticipates utilizing for replacing or transitioning the interim TVR bridge offerings to the ultimate AMI-enabled time-varying rates proposed by Eversource to be implemented following AMI deployment.

BETP-45. (Rate 7) For calendar years 2020 through 2025, provide a summary table for residential Rate 7 showing:

a. year-end enrollment;
b. new enrollment and departures;
c. average annual on-peak and off-peak usage per customer; and
d. the average bill under Rate 7 compared with the bill the same customers would have received under Rate 1.

BETP-46. (Rate 7) Within the past five years, has the Company performed, or has the Company retained a consultant to perform, any analysis of its current Rate 7 customer usage. If yes, please describe the analysis performed, who performed the analysis and the conclusions reached from that analysis. Please then explain how those findings informed the proposed Rate 7 design in this case and, if known, will inform the Company's October 1, 2027 TVR application.

BETP-47. (TVR Customer Engagement Plan) Refer to Exhibit CLP-RATES-8 Provide the proposed implementation schedule for the TVR Customer Engagement Plan.

BETP-48. (TVR Customer Engagement Plan) Refer to Exhibit CLP-RATES-8, Section 5.4. Please describe the objective performance standards that are contemplated for the TVR Customer Engagement Plan, including any numerical targets or benchmarks for customer awareness, engagement, enrollment, complaints, and opt-outs. If numerical targets have not yet been established, identify when and through what process they will be proposed.

BETP-49. (TVR Customer Engagement Plan) Refer to CLP-RATES-8. Please explain how the Company will evaluate whether customers understand the structure and potential bill impacts of TVR rates including, but not limited to:

a. the metrics, performance targets, and data sources the Company will use, including, at a minimum, customer survey results, enrollment and opt-out rates, customer inquiries and complaints, and actual bill impacts.
b. how these results will be separately assessed for financial-hardship, medically protected, low-income, limited-English-proficiency, and other customer groups requiring additional protections;
c. the frequency of evaluation, how results will be reported to PURA, and what corrective actions the Company will take if customers demonstrate low understanding or experience material adverse bill impacts.

BETP-50. (Phased AMI Enabled TVR Availability) Provide a summary timeline, using calendar dates, for completion of the principal capabilities needed for AMI-enabled TVR, including AMI meter deployment, interval-data availability, the MDMS, the CIS billing capability, the customer portal, and the rate-comparison tool.

BETP-51. (Phased AMI Enabled TVR Availability) Please explain whether the Company evaluated offering AMI-enabled TVR on a voluntary, pilot, or geographic basis to customers whose meters and supporting systems are operational before system-wide deployment is complete. Summarize the principal benefits, risks, and operational considerations identified and explain the basis for the Company's proposed timing.

BETP-52. (AMI) Please provide the breakdown of total AMR meters currently nearing the end of their useful lives in Eversource's Connecticut territory and how many years are remaining in their useful lives?

BETP-53. (AMI) Please provide the estimated cost differences between the existing letters of intent (LOIs) and pricing proposals if implementation proceeds prior to early 2027 versus if implementation proceeds as an outcome from this rate case according to its current time schedule?

BETP-54. (AMI) Please provide a detailed breakdown of what subcomponents and their respective costs constitute the $432 million in back office system expenses necessary to begin AMI deployment.

BETP-55. (AMI) Please provide greater insight as to why all $432 million of back office system upgrade expenses must be frontloaded before AMI meters can start incrementally realizing benefits for CT?

BETP-56. (PBR) Refer to CLP-PBR-1, p. 8 and 66) and CLP-ELP-1 pg. 115-116. In your testimony it states that the purpose of PBR implementation is to effectively "mimic the forces that would have been in play if there was competition" where firms "compete to provide the best service at the lowest cost through effective operations" (CLP-PBR-1, pg. 8). Please provide greater support for why the company feels these incentives/penalty levels will achieve the objective of PBR by mimicking competitive market forces to provide the best/lowest cost service.

BETP-57 (PBR) What are the estimated total potential impacts on net income profit margin or realized return on equity under the proposed 0.5% penalty threshold / 0.25% incentive threshold for total distribution revenues?

BETP-58. (PBR) Refer to CLP-PBR-1, CLP-PBR-2 , pgs. 11-12, 38-39. Since the revenue cap is determined through the outputs of the I-X formula and has significant impacts on total revenue, to better understand how the inputs of this formula were calculated in LEI's TFP study, p lease provide the calculations and procedure used for the LEI study to calculate the number of customers served and electricity sales data (from form EIA-861 and FERC form 1 respectively) associated with figure 14 (CLP-PBR-2, pg. 38-39).

BETP-59. (PBR- negative X factor) Refer to CLP-PBR-1, CLP-PBR-2 pgs. 11-12, 38-39. Please provide details regarding any instance where an electric utility proposed a negative X-factor (productivity factor) value within a performance-based ratemaking or multi-year rate plan and whether the value was subsequently approved or rejected by the PUC in the state which it was proposed? For each identified instance please provide: (1) the specific negative X-factor value(s) approved or rejected; (2) the name of the state and the public utility commission that authorized or did not approve the value; (3) the specific docket number, formal filing name, and exact approval date associated with each instance; (4) a complete citation or copy of the order, including any textual justification provided by the commission for adopting or rejecting a negative productivity offset and the final approved X-factor value.

BETP-60. (PBR- Z factor) Refer to Exhibit CLP-PBR-1p. 74. Provide a summary of Z Factor designs tested and implemented in other jurisdictions, including the decision where such designs were approved, the qualifying criteria for associated expenses and the associated tariffs.

BETP-61. (PBR- K-bar) Refer to Exhibit CLP-PBR-1 p. 69. Describe what a "K-bar arrangement" is and provide more detail of K-bar arrangements approved in Massachusetts and Alberta. Compare and contrast this type of capital funding mechanism with the Company's proposal.

BETP-62. (PBR) Refer to Exhibit CLP-PBR-1 p. 69. Compare and contrast the British Columbia example of a PBR framework to: a) the Company's proposal; and, b) a conventional multi-year rate plan.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been furnished to the service list in compliance with Conn. Agencies Regs. § 16-1-15.

By: */s/ Obinna E. Anugweje*
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Commissioner of the Superior Court