| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-002 | N/A | Total interconnection-related payments collected from customers from 2018 - 2025 and where amounts in rate base, test year, and revenue requirment, identifying specific schedules and work papers. | Partially | Requires Creation of Analysis Not Readily Available; Overly Burdensome; | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually compiling all interconnection-related payments from 2018 to 2025 since such payments may be made by various methods (i.e., check, wire transfer, or credit card), which would also be an undue burden to create. |
| ALLCO-004 | N/A | Refunds owed recorded as liabilities? Identify account(s), total end of year balance from 2022 - 2025 of unpaid refunds and state how reflected in rate base, cash working capital, or revenue requirements. | Partially | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance; | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource confirmed that refunds owed are recorded as liabilities on the Company's books until the refund is issued and stated how such balances are reflected in rate base, cash working capital, and revenue requirements in the Company's response to ALLCO-002. Eversource objects to further responding to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing final accountings completed against the refunds issued during those years and then use that information to create the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because it seeks the creation of analysis that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Please also refer to the Company's response to ALLCO-179(d). Refunds are issued within 30 days unless the subject of a dispute. |
| ALLCO-005 | N/A | Provide aging schedule of unpaid interconnection refunds, showing project, the date the refund obligation was determined, the amount, the reason the payment has not been paid, and Company policy for paying refunds. | Partially | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | The Company partially responded to this question providing Section 5.3.2 of the Interconnection Agreement as the standard timeline. Please also refer to the Company's response to ALLCO-179(d). Refunds are issued within 30 days unless the subject of a dispute. Eversource objects to further responding to this request because it seeks the creation of analysis concerning disputes over refunds (e.g., to whom is the refund owed, does the generator accept the amount of the refund, etc.) that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-007 | N/A | Interconnection applications pending more than 1, 3 and 5 years and for each application pending more than 5 years, identify application number, application date, requested capacity (MW), substation and circuit and current status. | Partially | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance; Publicly Available; | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing publicly available and PowerClerk information for the Level 2 applications that have been pending for more than 1, 3, and 5 years and then use that information to create the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because it seeks the creation of analysis that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because as stated in the Company's response much of the requested information is publicly available. See also Eversource response to ALLCO-120 where Eversource provided the number of pending applications. |
| ALLCO-017 | N/A | 2019-2025: Time between receipt of partially-executed IA and return of fully-executed IA; produce 2026 data and respond to question about older Allco project. | Fully | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | The Company has fully responded to this interrogatory. The Company stated that it does not track this information and that such functionality was added to PowerClerk in early 2026 so that execution dates are "now" recorded. This functionality was added on a going-forward basis; consequently, historical information is not available in PowerClerk and cannot be produced. Eversource also objects to this request because neither the requested 2026 information nor the historical information about a single Allco project is material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-018 | N/A | Executive and variable compensation included in overheads, identify each component and rates, and quantify amounts charged to interconnection customers from 2020 to 2025. | Partially | Requires Creation of Analysis Not Readily Available; Overly Burdensome; | C.G.S. §§ 4-177c(a) & 4-178(1) | **Subject to PURA's ruling on Motion Nos. 084 & 099, the Company proposes to provide a supplement to ALLCO-018 to confirm that there is no variable/incentive compensation in overheads.** Eversource objects to the remainder of this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing the documentation for each interconnection project completed between 2020 and 2025 to determine, for each project, each overhead component and its applicable rate and then use that information to create the requested analysis, which would also be an undue burden to create. |
| ALLCO-059 | N/A | CIAC applied to all projects between 2018-2025 | Fully | N/A | N/A | The Company has fully responded to this interrogatory. Consistent with the Company's statement in its response to ALLCO-059, on October 27, 2026, the Company submitted as much of the requested information as could be provided in ALLCO-059-SP01, Attachment 1. |
| ALLCO-060 | (a) | 2017-2025: Total dollar amount of overhead charges -- meaning every single charge -- billed to or collected from interconnection customers of any kind, stating separately for each year the total base costs against which the overheads were applied and effective overall overhead percentage. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without reviewing all project cost documentation from 2017 to 2015 in order to provide the total dollar amount for each year and then perform the requested analysis to determine the effective overall overhead percentage for each year, which would thus be an undue burden to create. |
| ALLCO-060 | (b) | 2017-2025: Total dollar amount returned to customers in each year on account of overhead charges, stating separately any interest paid. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | See objection to ALLCO-060, subpart (a). |
| ALLCO-060 | (c) | 2017-2025: Net overhead charges retained by Company for each year and cumulatively | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | See objection to ALLCO-060 subpart (a) |
| ALLCO-060 | (d) | 2017-2025: FERC account where retained amounts are recorded and where those amounts are reflected as an offset, credit, or reduction in rate base, revenue requirement or cost of service. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | See objection to ALLCO-060 subpart (a) |
| ALLCO-060 | (e) | 2017-2025: If subparts (a)-(d) cannot be produced, explain why and describe system that would contain this information. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | See objection to ALLCO-060 subpart (a) |
| ALLCO-064 | N/A | Portion of amounts in response to ALLCO-064 collected from customers and attributable to overheads. | Fully | N/A | N/A | The Company has fully responded to this interrogatory. Motion No. 084 states that this interrogatory was "[a]nswered in substance." Eversource is unable answer this follow-up question in Motion No. 084, because the Company does not track information this way. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-101 | (a) | Final Accounting for Allco Projects: Produce general ledger transaction detail - every entry or cost - showing transaction date, FERC and internal account, amount, description, source system or module, cost element or resource type, vendor or employee-group identifier, in Excel format. | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because final accounting information for specific Allco projects is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing all final accountings (which occur outside of PowerClerk) and backup documentation for these specific projects to create an Excel spreadsheet with the requested information, which would thus be an undue burden to create. |
| ALLCO-101 | (b) | Final Accounting for Allco Projects: Produce source records supporting each charge in subpart (a): third party invoices, purchase orders, contractor payment applications, materials issue records, and internal labor-cost or timesheet summaries. | No | Materiality; Relevance; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because final accounting information for specific Allco projects is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because the extent of the records request would cause an undue burden to produce. |
| ALLCO-101 | (c) | Final Accounting for Allco Projects: For every overhead, loader, or other indirect amount included in the charges, state % or rate applied, the base to which it applied, the cost pool to which the rate derives, and the schedule and workpaper in which the pools costs are recorded. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because final accounting information for specific Allco projects is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-101 | (d) | Final Accounting for Allco Projects: Reconcile ledger total for each project to amounts paid by Allco and amounts in Allco final accountings. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because final accounting information for specific Allco projects is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-102 | (a) | Overheads for Interconnections from 2017 to Present: Identify each person involved in establishing/ revising/ deviating from them. | Partially | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource provided the departments that are responsible for creating and maintaining overhead rates. Eversource objects to answering the remainder of this subpart because the names of specific Eversource personnel and contractors responsive to this request are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-102 | (b) | Overheads for Interconnections from 2017 to Present: Identify and produce each overhead policy, procedure, etc. | Fully | N/A | N/A | The Company has fully responded to this subpart. Eversource provided its current overhead policy as ALLCO-102, Attachment 1. |
| ALLCO-102 | (c) | Overheads for Interconnections from 2017 to Present: Who developed each loader. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the names of specific Eversource personnel and contractors responsive to this request are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-102 | (d) | Overheads for Interconnections from 2017 to Present: Review of overhead charges for consistency, produce review, and identify authors. | Partially | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource has responded to this subpart discussing the development and maintenance of overhead rates. Eversource objects to the portion of the subpart that asks for the identity of the authors because the names of specific Eversource personnel and contractors responsive to this request are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-104 | (a) | Final Accounting for Allco Projects: Identification of persons involved in final accountings. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the names of specific Eversource personnel and contractors responsive to this request are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-104 | (b) | Final Accounting for Allco Projects: Identification of persons to whom these final accountings were circulated. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | See above response to ALLCO-104, subpart (a) |
| ALLCO-104 | (c) | Final Accounting for Allco Projects: Level of authority to authorize refund payments and identification of such persons. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | **Subject to PURA's ruling on Motion Nos. 084 & 099, the Company proposes to provide a supplement to ALLCO-104(c) to describe the level of authority involved in authorizing refund payments in general.** For the portion of this request that requests the identification of such persons, see above response to ALLCO-104, subpart (a) |
| ALLCO-104 | (d) | Final Accounting for Allco Projects: Identification of persons involved refund decisions for Allco's projects. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | See above response to ALLCO-104, subpart (a) |
| ALLCO-105 | (a) | 2020 Written Communication re: Allco Project: Identification of persons involved in this communication. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the names of specific Eversource personnel and contractors responsive to this request are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-105 | (b) | 2020 Written Communication re: Allco Project: State where in books the projected refund was recorded - account, amount accured, date. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because refund information for a specifc Allco project is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Please also refer to the Company's response to ALLCO-002, which states that "the refund obligation is recorded as a liability on the Company's books until the payment is issued to the interconnection customer. |
| ALLCO-105 | (c) | 2020 Written Communication re: Allco Project: Each action taken relating to overheads from 2020 to December 2024, identifying person who took such action. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the actions taken with respect to a single Allco project and the names of specific Eversource personnel and contractors who took such actions are not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-105 | (d) | 2020 Written Communication re: Allco Project: If no true-up refund between 2020 and 2024, state reason and person who so decided. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the status of a refund for a single Allco project and the names of specific Eversource personnel and contractors involved in any true-up of the project are not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-106 | N/A | Identify every document from 2017 through present that compared actual costs of administration, engineering, or overheads to the estimated or %-based amounts billed, and then state date, costs, identify author and recipients, and produce it. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without reviewing all final accountings and documents related to final accountings from 2017 to present and then identifying date, costs, author, and recipients for each document, which would thus be an undue burden to create. Eversource further objects to this request because the production of all final accountings and documents related to final accountings from 2017 to present and the identification of Eversource personnel and interconnection customers are not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-107 | (a) | Overhead Linework Charge for Allco Project: Provide the categories for each cost comprising the linework charge. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | This request for more information relating to a single cost category for a completed Allco project is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Further, this request appears to confuse overhead linework (versus underground linework) with overheads/loaders. This cost category related to the former, not the latter. |
| ALLCO-107 | (b) | Overhead Linework Charge for Allco Project: Identify each person who calculated or approved the charge. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | See response to ALLCO-107, subpart (a). In addition, the identification of specific company personnel is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-107 | (c) | Overhead Linework Charge for Allco Project: Reconcile amount charged versus figure quoted from November 2020 statement. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | See response to ALLCO-107, subpart (a). |
| ALLCO-107 | (d) | Overhead Linework Charge for Allco Project: Produce all construction work order records for this charge. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | See response to ALLCO-107, subpart (a). |
| ALLCO-107 | (e) | Overhead Linework Charge for Allco Project: Provide aggregate amounts of similar charges for years 2017 through 2025. | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | With respect to the materiality and relevance objections, see response to ALLCO-107, subpart (a). Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing all final accountings (which occur outside of PowerClerk) and backup documentation from 2017 through 2025 to identify similar charges and then aggregate those charges, which would thus be an undue burden to create. |
| ALLCO-108 | (a) | Final Accounting for Allco Projects and every other refund computed but unpaid at any time from 2017 through present: Account in which each refund is recorded, date recorded, and current balance. | Partially | Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Please refer to the Company's prior response to ALLCO-004 and to the Company's subsequent response to ALLCO-179. Eversource objects to the remainder of the request as overly burdensome to provide the date on which each refund since 2017 was recorded along with balance information. Eversource further objects to the remainder of the request because it seeks information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-108 | (b) | Final Accounting for Allco Projects and every other refund computed but unpaid at any time from 2017 through present: Where liabilities are reflected in test year, rate year, and balance sheet including any offset to rate base. | Fully | N/A | N/A | This subpart has been fully answered. Please refer to the Company's response to ALLCO-179, citing to ALLCO-157(d) stating that customer advances and CIAC deposits are not reflected within the Company's cash working capital or lead-lage analysis. |
| ALLCO-108 | (c) | Final Accounting for Allco Projects and every other refund computed but unpaid at any time from 2017 through present: Interest on amounts held in FERC Account 252500 and how those earnings are treated in the cost of service. | No | N/A | N/A | Subject to PURA's ruling on Motion Nos. 084 & 099, the Company proposes to provide a supplement to ALLCO-108(c) to state whether amounts held in FERC Account 252500 accrue interest and, if so, how those earnings are treated in the cost of service. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-108 | (d) | Final Accounting for Allco Projects and every other refund computed but unpaid at any time from 2017 through present: Produce schedule of every refund computed from 2017 through present, showing customer, amount computed, date computed, date paid, and amount outstanding. | No | Requires Creation of New Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing all final accountings from 2017 to present, along with researching payment information for each project, and then using that information to create the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because it seeks the creation of analysis that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-110 | (a) | Final Accounting for Allco Projects: Identify and produce written policy re: refund of CIAC fee or state none exists and describe practice and origin. | Fully | Unduly Repetious Evidence. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to the request for the Company's to produce the Company's policy regarding the refund of the CIAC fee as unduly repetitious. Please refer to the Company's response to ALLCO-064, which states refunds to interconnection customers are deducted from taxable income in the year paid. |
| ALLCO-110 | (b) | Final Accounting for Allco Projects: From 2017 through present, identify each interconnection project for which a CIAC fee or percentage was collected where the customer at some point submitted a FERC Form 556, stating amount collected, date collected, date refunded, and amount still held. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing backup documentation for each interconnection project from 2017 to present to identify whether a FERC Form has been submitted and, if so, review the documentation in order to manually create the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because it seeks the creation of analysis that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-110 | (c) | Final Accounting for Allco Projects: Explain decision to collect CIAC amounts from facilities with a Form 556 certification and identify person who established practice. | Partially | Unduly Repetious Evidence; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to the request for the Company's decision to collect CIAC amounts as unduly repetitious. Please refer to the Company's response to ALLCO-064, which states that the Company generally deems distribution system interconnection payments to be taxable income and are therefore charged a tax adder/gross up. Eversource further objects to this subpart because the names of specific Eversource personnel and contractors responsive to this request are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-111 | N/A | 2017 - Present: All customer requests for interconnection cost information/documentation, stating date, requester, substance of request, Company's response, including the extent of production and identification of person who made the decision; state whether records exist for certain Allco projects. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without numerous employees and contractors searching their email records, along with PowerClerk, to identify each request from 2017 to present and then use that information to create the requested analysis, which would also be an undue burden to create. Eversource further objects to this subpart because the names of specific Eversource personnel and contractors responsive to this request are not material to the review of the Company's rate case application. Eversource further objects to this request because it seeks the creation of analysis and information about Allco projects that are not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-112 | N/A | 2017 - Present: Final accounting information for each project within that timeframe showing customer category; inservice / completion year; construction cost; % overhead/CIAC rate applied; overhead dollars billed; actual overhead; project management and administration $ and %; refund or amount due; date computed; date paid; and amount outstanding. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing the final accounting backup documentation for each interconnection project from 2017 to present, which would also be an undue burden to create. Eversource further objects to this request because it seeks the creation of analysis that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-113 | (a) | Disputes re: CIAC/overheads costs | Fully | N/A | N/A | Eversource has fully responded to this interrogatory. Please refer to the Company's response to ALLCO-182, which is a follow-up to ALLCO-113 issued by Allco on October 13, 2026. Outside of Eversource Legal, the Company does not track the requested information. |
| ALLCO-113 | (b) | Disputes re: estimated v. actual costs | Fully | N/A | N/A | See response in ALLCO-113, subpart (a). |
| ALLCO-113 | (c) | Disputes re: delays in final accounting | Fully | N/A | N/A | See response in ALLCO-113, subpart (a). |
| ALLCO-113 | (d) | Disputes re: documentation | Fully | N/A | N/A | See response in ALLCO-113, subpart (a). |
| ALLCO-120 | (b) | Create analysis of pending Level 2 interconnection applications pending more than 3 years, identify application number, the MW AC, the circuit and substation, the current PowerClerk status, the date of the most recent Company action, and reason application remains pending. | Partially | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance; Publicly Available; Unduly Repetitious Evidence | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing publicly available and PowerClerk information for the Level 2 applications that have been pending for more than 3 years and then use that information to create the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because it seeks the creation of analysis that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because as stated in the Company's response to ALLCO-007 much of the requested information is publicly available. For this same reason, Eversource further objects to this request as unduly repetitious. |
| ALLCO-121 | (a) | Identify each status, milestone, and date field records for application, and whether timestamp is automatic or manual. | Partially | N/A | N/A | **Subject to PURA's ruling on Motion Nos. 084 & 099, the Company proposes to provide a supplement to ALLCO-121(a) to provide a printout of the 140 different statuses in PowerClerk and clarification on whether timestamps are automatic or manual.** |
| ALLCO-121 | (b) | For each Allco application, produce the complete PowerClerk status changes history with date and time of each status change, including dates application was received, deemed complete, screened, studied, approved (contingent or otherwise), date of interconnection agreement was issued, date generator-executed agreement was received, date of Company's countersignature, and the date of Permission to Operate | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to the requested analysis because the complete PowerClerk status change history for Allco projects is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing the the relevant information within PowerClerk and in Eversource personnel and contractor email records for each Allco projectand then compiling that information to create a spreadsheet with the requested analysis, which would also be an undue burden to create. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-121 | (c) | All PowerClerk status changes with the same fields listed in subpart (b) for all projects since 2019. | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to the requested analysis because the complete PowerClerk status change history for Allco projects is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing the relevant information within PowerClerk and in Eversource personnel and contractor email records for each Allco projectand then compiling that information to create a spreadsheet with the requested analysis, which would also be an undue burden to create. |
| ALLCO-122 | (a) | Allco Applications: Identify each Guideline timeframe missed by the Company, the applicable Guideline section, the date the timeframe expired, the reason it was missed, whether Allco requested a status update, and whether the Company provided a 3 business day response.. | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to the requested analysis because compliance with Guideline timeframes with respect to Allco papplications is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing Eversource personnel and contractor email records for each Allco project to determine whether specific timeframes were met and then compiling that information to create a spreadsheet with the requested analysis, which would also be an undue burden to create. |
| ALLCO-122 | (b) | Identify authority for statement that ISO-NE review required for >1MW projects. | Fully | N/A | N/A | The Company has fully responded to this interrogatory. Please refer Eversource's response to ALLCO-184, which states that such projects may be subject to applicable provisions of ISO-NE's OATT Planning Procedures ***as required by ISO-NE*** . |
| ALLCO-122 | (c) | Allco Applications: For each application >1MW, state date referred to ISO-NE, date of ISO-NE's determination, the outcome, any study or fee required, and elapsed time between application and issuance of Interconnection Agreement. | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the requested analysis of ISO-NE's determinations with respect to Allco projects is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. These are not Eversource's determinations. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing Eversource personnel and contractor email records for all Allco applications for the relevant ISO-NE-related information and then compiling that information to create a spreadsheet with the requested analysis, which would also be an undue burden to create. |
| ALLCO-122 | (d) | Do the Guidelines authorize the withholding of signature pending ISO-NE review? | Fully | N/A | N/A | The Company has fully responded to this interrogatory. Please refer to ALLCO-132. |
| ALLCO-126 | (a) | Estimate of upgrade costs for Allco's Windham facilities. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because an estimate for Allco's Windham facilites is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Further, these facilities are the subject of the 2021 Settlement Agreement. |
| ALLCO-126 | (b) | Amounts collected for interconnection cost for Allco's Windham facilities. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the amounts collected Allco's Windham facilites are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Further, these facilities are the subject of the 2021 Settlement Agreement. |
| ALLCO-126 | (c) | Actual costs for upgrades and facilities constructed for Allco's Windham facilities by work order and cost element. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the requested analysis of actual project costs for Allco's Windham facilites by work order and cost element is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Further, these facilities are the subject of the 2021 Settlement Agreement. |
| ALLCO-126 | (d) | Amount refunded/credited to Allco's Windham facilities. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the amount refunded/credited to Allco's Windham facilites is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Further, these facilities are the subject of the 2021 Settlement Agreement. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-126 | (e) | Final accounting information for interconnection of Allco's Windham facilities. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because final accounting information Allco's Windham facilites is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Further, these facilities are the subject of the 2021 Settlement Agreement. |
| ALLCO-126 | (f) | Any amount by which the collected amount exceeded the actual cost recorded for Allco's Windham facilities. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because any difference between estimated and actual costs for Allco's Windham facilites is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Further, these facilities are the subject of the 2021 Settlement Agreement. |
| ALLCO-127 | (a) | Cost of transfer-trip scheme and substation work related to Allco's Windham facilities. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the cost of the transfer-trip scheme and substation work related to Allco's Windham facilites is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Further, these facilities are the subject of the 2021 Settlement Agreement. |
| ALLCO-127 | (b) | All interconnection-related charges billed or withheld from Allco's Windham facilities since 2017. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because interconnection-related charges billed or withheld from Allco's Windham facilites since 2017 are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Further, these facilities are the subject of the 2021 Settlement Agreement. |
| ALLCO-128 | (a) | 2017 Allco project: Provide unit cost per mile converting single phase to three phase. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the unit cost per mile of converting single phase to three phase for a 2017 Allco project is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-128 | (b) | 2017 Allco project: Provide amount of estimate designated as CIAC, percentage applied, tax rationale, and applicable Company policy. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because providing the request CIAC and CIAC-related information for a 2017 Allco project is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-128 | (c) | 2017 Allco project: Identify third-party contractor pricing for project. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because providing third-party contractor pricing for a 2017 Allco project is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-128 | (d) | 2017-2025: Average cost per mile for single-phase-to-three-phase conversions completed in each year. | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to the requested analysis because the average cost per mile of single-phase-to-three-phase conversions is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing every applicable interconnection project completed within each year to determine the cost per mile, which would also be an undue burden to create. |
| ALLCO-128 | (e) | Current interconnections cost estimates for line conversions derived from actual historical unit costs. | No | N/A | N/A | **Subject to PURA's ruling on Motion Nos. 084 & 099, the Company proposes to provide a supplement to ALLCO-128(e) to discuss how estimates are derived.** |
| ALLCO-132 | (a) | Produce and analyze each monthly PowerClerk report from 2020 to present. | Fully | N/A | N/A | Eversource fully responded to this subpart. This is not a formal report, but an internal tool. The requested information cannot be produced. |
| ALLCO-132 | (b) | Date the Company adopted policy it will not issue interconnection agreement until ISO-NE requirements met. | Fully | N/A | N/A | Eversource fully responded to this subpart. The Company references the relevant language in the PURA-approved Guidelines. This is not a Company policy -- the Company follows the Guidelines. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-132 | (c) | Allco Applications: For each Allco application, create analysis related to applicability of policy in subpart (b). | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to the requested analysis because there is no policy -- the Company follows the Guidelines; such analysis of Allco applications is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing the backup documentation for each Allco application, which would also be an undue burden to create. |
| ALLCO-132 | (d) | Allco Applications: Explain basis for allegedly treating Allco applications of <= 1 MW as being subject to ISO-NE review. | Fully | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource fully responded to this subpart. The Company explained that this procedure is under the jurisdiction of ISO-NE and pointing to specific sections of the ISO-NE Tariff where additional guidance may be obtained. Eversource objects to further responding to this subpart with respect to specific Allco applications because such information is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-133 | (a) | 2018 - 2025 and Test Year: Total Burns & McDonnell charges recorded to Account 186010, total charges billed to customers, and for each Allco application to which any such charge was billed, the amount, the date, and reference the invoice/work order. | Partially | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource has fully responded to the non-Allco portion of this subpart. Eversource objects to the Allco-portion of this subpart because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing work orders relevant to each Allco application to determine the portion of charges applicable to such application and then using that information to create the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because it seeks Allco-specific information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-133 | (b) | Identification of any overhead applied to Burns & McDonnell charges. | Fully | N/A | N/A | Please refer to the Company's response to ALLCO-109. **Subject to PURA's ruling on Motion Nos. 084 & 099, the Company proposes to provide a supplement to ALLCO-133(b) to clarify this response.** |
| ALLCO-133 | (c) | Project management functions of Burns & McDonnell duplicative of functions for which overheads are applied? Explain why not. | Fully | N/A | N/A | Please refer to the Company's response to ALLCO-109. **Subject to PURA's ruling on Motion Nos. 084 & 099, the Company proposes to provide a supplement to ALLCO-133(c) to clarify this response.** |
| ALLCO-133 | (d) | State total test year and rate year cost of administering interconnection program that is recovered from ratepayers through revenue requirement (ALLCO-010); from 2018 to 2025, state total administration, project management, and overhead charges for each year; explain how not double recovered from ratepayers and interconnection customers. | Partially | Unduly Repetitious Evidence; Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | Please refer to the Company's response to to ALLCO-055, which is responsive to the part of the question concerning how these costs are not double recovered. Eversource objects to the remainder of this request as unduly repetitious as it requests that Eversource restate its prior response to an interrogatory. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing interconnection program cost information from 2018 to 2025 and then separating such costs into three buckets: total administration, project management and overhead costs for each year, which would also be an undue burden to create. |
| ALLCO-134 | (a) | Produce information relating to each project from 2018 through mid-2026 for which payments were collected, the project is in service, but a final accounting report has not been completed as of June 30, 2026, stating for each the in-service date, amount collected, plant cost recorded, and elapsed time since in-service. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing records to determine each project that was in service as of June 30, 2026, but was still undergoing a final accounting and then using those records to create the requested analysis, which would also be an undue burden to create. Eversource further objects to this request because it seeks information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-134 | (b) | Based on subpart (a), state plant in service as of June 30, 2026, included in rate base, without CIAC offset, and revenue requirement effect. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Please see response to ALLCO-134, subpart (a). |
| ALLCO-134 | (c) | State Company policy on the completion of final accounting reports and average and maximum elapsed time for projects place in service from 2018 to 2025. | Partially | Unduly Repetitious; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to the request for the Company's policy on the completion of final accountings as unduly repetitious. Please refer to the Company's prior response to ALLCO-103, which points to Section 1.2 of the PURA-approved Interconnection Guidelines. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing all final accountings (which are performed outside of PowerClerk) between 2018 to present and then performing the requested analysis on these accountings, which would also be an undue burden to create. |
| ALLCO-134 | (d) | State whether the Company earns a return on plant funded by payments during period between in-service and reconciliation. | Partially | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource has six months to reconcile project costs to determine whether a refund is owed to the customer or the customer owes additional funds to cover the cost of the upgrades. Eversource further objects to this request because it seeks information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-134 | (e) | Date by which ALLCO-059 will be supplemented and if an element cannot be answered state why. | Fully | N/A | N/A | See Row 8, ALLCO-059. On October 27, 2026, the Company submitted as much of the requested information as could be provided in ALLCO-059-SP01, Attachment 1. |
| ALLCO-135 | (a) | Date the Company first refused to issue an IA on grounds that ISO-NE requirements had not been met. | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the refusal to issue an IA is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Please also refer Eversource's response to ALLCO-184, which states that such projects may be subject to applicable provisions of ISO-NE's OATT Planning Procedures ***as required by ISO-NE***. This is not Eversource's requirement. |
| ALLCO-135 | (b) | Produce spreadsheet for all applications between 2018 - present for which the Company refused to issue an IA on grounds that ISO-NE requirements have not been met. | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the refusal to issue an IA is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Please also refer Eversource's response to ALLCO-184, which states that such projects may be subject to applicable provisions of ISO-NE's OATT Planning Procedures ***as required by ISO-NE***. This is not Eversource's requirement. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing its records of all applications between 2018 to present, which would also be an undue burden to create. |
| ALLCO-135 | (c) | Each application in subpart (b) that was later withdrawn or cancelled. | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | See response to ALLCO-135, subpart (b). |
| ALLCO-135 | (d) | Number of applications in subpart (b) that are 1 MW or less. | No | Materiality; Relevance; Requires Creation of New Analysis Not Readily Available; Overly Burdensome. | C.G.S. §§ 4-177c(a) & 4-178(1) | See response to ALLCO-135, subpart (b). |
| ALLCO-142 | (e) | Perform computations for different ROE levels | Fully | Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource has fully responded to subpart (e), explaining why this request would produce unreliable and misleading information. Eversource objects to further responding to this subpart because unreliable and misleading information is not relevant to the review of the Company's rate case application, i.e., it does not make a material fact more or less probable. |

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| ALLCO-143 | (e) | Perform computations for different ROE levels using the cost of new debt | Fully | Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource has fully responded to subsection (e), refering to the Company's response to ALLCO-142. In addition, the cost of new debt provided in subpart (c) is only an estimate and not based on any prior analysis. Eversource objects to further responding to this subpart because unreliable and misleading information is not relevant to the review of the Company's rate case application, i.e., it does not make a material fact more or less probable.. |
| ALLCO-145 | (a)(v) | Presentation to Board or finance committee on cost of capital | Partially | N/A | N/A | **Subject to PURA's ruling on Motion Nos. 084 & 099, the Company proposes to provide a supplement to ALLCO-145 to confirm that there has been no such presentation given since 2022.** |
| ALLCO-147 | (a) | Legal interpretation of IRS Notice 2016-36 | No | Privilege; Materiality; Relevance | C.G.S. §§ 4-177c(a), 4-178(1) & 4-178(2) | Eversource objects to this request because such interpretation would be protected by the attorney-client and work product privileges. In addition, the Company's fact witness cannot speak to a legal interpretation of this IRS Notice. Eversource further objects because the legal interpretation of this notice is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-147 | (b) | Safe harbor evaluations made by the Company | No | Privilege; Materiality; Relevance | C.G.S. §§ 4-177c(a), 4-178(1) & 4-178(2) | Eversource objects to this request because any legal evaluations pursuant to this notice would be protected by the attorney-client and work product privileges. In addition, the Company's fact witness cannot speak to legal evaluations. Eversource further objects because legal evaluations pursuant to this notice are not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-147 | (c) | For each Allco application and specific Allco projects, create analysis on CIAC Tax Adder charged, CIAC estimate to which applied, portion of estimate consisting of percentage overhead, CIAC, or other loaders, and CIAC Tax Adder computed on loader portion. | No | Materiality; Relevance; Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it seeks information that is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing the backup documentation for each Allco application and project, which would also be an undue burden to create. |
| ALLCO-148 | (c) | Amount of plant in service as of December 31, 2025, funded by interconnection payments not yet reconciled and revenue requirement impact. | Partially | Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource has partially responded by referring to Exhibit CLP-ADDITIONS-4, for actual capital expenditures and in-service capital additions since 2017. Eversource objects to further responding to this subpart because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able to create the requested analysis without manually analyzing all interconnection projects not yet reconciled as of December 31, 2025, against the expenditures and additions in Exhibit CLP-ADDITIONS-4 and then calculating the revenue requirement impact, which would also be undue burden to create. |
| ALLCO-149 | (b) | For each vendor over $50K, each matter billed in the test year with nature, whether the Company was claimant or respondent and status of the matter. | No | Relevance; Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because the analysis requested is not relevant to the Company's rate case application, i.e., it does not make a material fact more or less probable. Allco has not demonstrated that it makes any material fact more or less probable. Please refer to the Company's response to ALLCO-033, Attachment 1, for legal service costs incurred in the test year and to OCC-309, Attachment 1 for outside legal costs by vendor in the test year. The Company has provided sufficient information of its legal costs in the test year. Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing its records of legal bills for the matters for each vendor over $50,000 and then describing the nature/subject, whether the Company is plaintiff or defendant, and the current status for each matter, which would also be an undue burden to create. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
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| ALLCO-149 | (c) | For Day Pitney and Cowdery Murphy & Healey, whether any portion of test year relates to Allco disputes or other interconnection disputes and the amount. | Partially | Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because specifying the amount related to Allco and other interconnection disputes is not relevant to the Company's rate case application, i.e., it does not make a material fact more or less probable. Allco has not demonstrated that it makes any material fact more or less probable. Please refer to the Company's response to ALLCO-033, Attachment 1, for legal service costs incurred in the test year and to OCC-309, Attachment 1 for outside legal costs by vendor in the test year. The Company has provided sufficient information of its legal costs in the test year. |
| ALLCO-149 | (d) | For Keegan & Werlin and Steptoe & Johnson, the portion of the Test Year expense relating to preparation of the rate case application and other matters. | Fully | Unduly Repetitious Evidence | C.G.S. § 4-178(1) | The Company has fully responded to subpart (d). Please refer to the Company's response to ALLCO-033. The Company referred to its prior response to ALLCO-033, stating that the Company reviewed the transactions and that no further adjustments were necessary. Eversource objects to further responding to this subpart as unduly repetitious. |
| ALLCO-149 | (f) | Produce OCC-308, Attachment 1 with amount billed in test year for each matter. | No | Relevance; Requires Creation of Analysis Not Readily Available; Overly Burdensome | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because adding the amount legal expense billed in the test year related to each settlement from 2021 to 2025 listed in OCC-308, Attachment 1 is not relevant to the Company's rate case application, i.e. it does not make a material fact more or less probable. Allco has not demonstrated that it makes any material fact more or less probable. Please refer to the Company's response to ALLCO-033, Attachment 1, for legal service costs incurred in the test year and to OCC-309, Attachment 1 for outside legal costs by vendor in the test year. The Company has provided sufficient information of its legal costs in the test year.Eversource further objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually reviewing its records of legal bills for the matters listed in OCC-308, Attachment 1 and then totaling the legal expenses incurred in the Test Year for each matter, which would also be an undue burden to create. |
| ALLCO-150 | (d) | In-house time spent on federal lawsuit | Fully | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource has fully responded to subpart (d) by providing all identiable time charged to Allco federal matters in 2025 and 2026. Eversource objects to further responding to this subpart because in-house attorney time spent on a lawsuit initiated by Allco in 2026 is not material to the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-151 | (d) | Corrected attachment to subpart A. | Partially | N/A | N/A | **Subject to PURA's ruling on Motion Nos. 084 & 099, the Company proposes to provide a supplement to ALLCO-062, Attachment 1.** |
| ALLCO-152 | (b) | Distribution loss factor applied to convert metered retail sales to whole load for settlement, the source and date of the loss study supporting each and produce the study in support. | Fully | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource fully responded that for ISO-NE load settlement reporting purposes the Company does not apply a static value to converted metered retail sales to wholesale loads. Eversource objects to further responding to this request because the analysis requested is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-152 | (c) | 2025 totals of hourly wholesale loads and of retail kWh billed and state difference, the Company's explanation of the difference, including losses, unaccounted-for energy, company use, and unbilled usage. | Fully | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource fully responded to this subpart citing to where the information is in the record and that the two numbers cannot equal one another due to a variety of reasons, including but not limited to thermal losses. Eversource objects to further responding to this request because the analysis requested is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-153 | (c) | Produce information related to Eversource Legal time spent on each non-regulated matter in 2025 and 2026. | Fully | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource fully responded to this subpart. No such non-CL&P legal costs were included in the rate year and test year and cited to ALLCO-022 for the development of legal function costs in cost of service and in the rate year. In the response, Eversource identified two projects that Eversource Legal employees charged time to in 2025 and 2026. Eversource objects to further responding to this subpart because non-regulated matters are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |

| Interrogatory No. | Subpart | Information Sought | Answered | Objection Type | Legal Authority | Additional Information/Analysis |
|---|---|---|---|---|---|---|
| ALLCO-153 | (d) | Produce detailed data w/r/t time spent by Eversource Legal on wind and non-regulated matters. | Fully | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource fully responded to this subpart. No such non-CL&P legal costs were included in the rate year and test year and cited to ALLCO-022 for the development of legal function costs in cost of service and in the rate year. Eversource objects to further responding to this subpart because non-regulated matters are not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |
| ALLCO-153 | (f) | Produce time records in subparts (c) and (d) | Fully | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | See responses to ALLCO-153, subparts (c) & (d). |
| ALLCO-154 | (b) | Provide an estimate to add the functionality of AldenOne to PowerClerk | No | Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this subpart because the requested estimate is not material to the review of the Company's rate case application,, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable . Further, modifications to PowerClerk software are performed by a contracted third-party vendor, not Eversource personnel. Such modifications to add AldenOne functionality to PowerClerk, to the extent it is possible given that these are two completely different systems, are outside the scope of this vendor's agreement with the Company. Given the complexity of this proposed project, the Company cannot produce an estimate within a reasonable timeframe. |
| ALLCO-154 | (c) | Produce project level data similar to what AldenOne can produce for all interconnection projects from 2018 to mid-2026, or for Allco projects. | No | Requires Creation of Analysis Not Readily Available; Overly Burdensome; Materiality; Relevance | C.G.S. §§ 4-177c(a) & 4-178(1) | Eversource objects to this request because it would require the Company to create analysis that it does not maintain in the ordinary course of business. Eversource is not able create the requested analysis without manually analyzing the relevant documentation for every interconnection project from 2018 through mid-2026, which would also be an undue burden to create. Eversource objects to further responding to this request because the analysis requested is not material to the review of the Company's rate case application, nor is it relevant to determine whether a material fact in the Company's rate case application is more or less probable. |