Date Filed: September 21, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Warren R. Boutin, Leanne M. Landry and Jeffrey D. Turano
Request from: ALLCO

Question:

Separately from the customer deposits and customer advances addressed in OCC-74, OCC-75, and OCC-270, state the total amount of deposits, performance assurance, development period security, operating period security, and bid deposits held by the Company from renewable energy developers, qualifying facilities, and interconnection customers as of the end of the Test Year; identify where such amounts are recorded on the Company's books; state whether such amounts are treated as cost-free capital, an offset to rate base, or otherwise in the proposed revenue requirement; and state the amount of interest accrued and paid on such amounts in the Test Year.

Response:

CL&P objects to this request on the ground that it is an improper effort by Allco to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

Without waiving said objection, the total amount of performance assurance, development period security and operating period security held by the Company was $14,115,950 as of the end of 2025. These deposits are refundable to project owners upon completion of project milestones or, if forfeited, credited as an offset to program costs recovered through fully reconciling rates approved in the Company's annual Rate Adjustment Mechanism. As such, the funds are not available to the Company for other purposes and are not reflected in the proposed revenue requirement. Lastly, interest only accrues on a deposit when required under the terms of the agreement and is returned or forfeited with original deposit as described above.