Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Treatment of behind-the-meter solar generation that is consumed on site.) For a customer with a rooftop or other behind-the-meter solar facility, describe step by step — by reference to the specific sections of Market Rule 1, Manual M-28, ISO-NE Operating Procedure No. 18, and the Company's own load settlement procedures on which the Company relies, which should be produced — how the energy generated by the facility and consumed on the premises (not exported to the distribution system) is treated in the Company's Load Settlement Process under Market Rule 1, separately for each of the following four cases: (i) a customer without interval metering served by a licensed third-party supplier; (ii) a customer without interval metering taking Standard Service or Last Resort Service from the Company; (iii) a customer with interval metering served by a third-party supplier; and (iv) a customer with interval metering taking Standard Service. For each case state: (a) the Load Asset to which the customer's load is assigned and the entity that holds it; (b) whether the on-site generation reduces the hourly load reported for that Load Asset, and if so how the hourly reduction is determined — in particular, for a profiled customer, whether the reduction in billed kilowatt-hours is spread across all hours of the month according to the rate-class load profile rather than assigned to the daylight hours in which the generation occurred, and whether the Company applies any solar-adjusted or net-metered-customer load profile; (c) which load-serving entity's wholesale energy, capacity, and regional-network-service obligations are reduced as a result, and by what amount per kilowatt-hour of on-site consumption; and (d) a worked example for a customer consuming 1,000 kWh in a month of which 400 kWh is supplied by on-site solar, showing the kilowatt-hours reported to ISO-NE for the customer's Load Asset in each case.

Response:

Eversource objects to this request. The requested information regarding load settlement for behind-the-meter solar generation is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute,

administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertains to load settlement for behind-the-meter solar generation, which is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting

the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Treatment of behind-the-meter solar generation that is exported.) For the same four cases, describe step by step, with the same citations, how energy generated by the facility and exported to the distribution system is treated in the Company's Load Settlement Process, and state: (a) whether the exported kilowatt-hours are metered as a separate channel and, if so, whether they are reported to ISO-NE as generation, as negative load on the host customer's Load Asset, as a reduction of the Metering Domain total that is allocated among all Load Assets, or otherwise; (b) the precise mechanism — section of Manual M-28 or other authority — by which, as the Company stated in ALLCO-095(a), "[t]he excess wholesale generation is distributed amongst all LSEs in the load zone," including whether the distribution is made in proportion to each LSE's share of load in the Company's Metering Domain, in the Connecticut load zone, or otherwise, and whether it is made hourly or monthly; (c) whether the exported energy is reflected in any Load Asset's coincident-peak contribution used to set capacity load obligations and regional network service charges, and for whose benefit; (d) whether the same treatment applies to the entire output of a facility that exports all of its generation — including facilities compensated under the buy-all option of the Non-Residential Renewable Energy Solutions, Shared Clean Energy Facility, and Residential Renewable Energy Solutions tariffs, LREC/ZREC facilities, and qualifying facilities selling under power purchase agreements — and if not, how the output of each such category is treated; and (e) a worked example for a 2 MW facility exporting 300 MWh in a month, showing the kilowatt-hours by which each Load Asset in the Company's Metering Domain is reduced, assuming Standard Service and Last Resort Service represent the percentage of Metering Domain load that they represented in the Test Year (state that percentage).

Response:

Eversource objects to this request. The requested information regarding load settlement for behind-the-meter solar generation is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow

repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertains to load settlement for behind-the-meter solar generation, which is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Who receives the value of exported generation the Company pays for.) With respect to facilities whose entire output the Company purchases or credits under a PURA-approved tariff or contract and whose cost is recovered from all distribution customers through the Non-Bypassable Federally Mandated Congestion Charge or otherwise: (a) confirm that, under the treatment described in ALLCO-095(a), the wholesale energy value of that output is distributed to every load-serving entity in the load zone, including third-party suppliers that bear none of the tariff cost, in proportion to their load; (b) state, for each calendar year 2020 through 2025, the total megawatt-hours of such exported output in the Company's Metering Domain, the share distributed to Load Assets held by third-party suppliers, and the value of that share at the applicable hourly real-time locational marginal prices; (c) state whether the Company's Standard Service and Last Resort Service procurement and reconciliation reflect any credit for that output, and where; and (d) state whether any portion of the capacity value, forward-reserve value, or regional network service reduction associated with that output accrues to third-party suppliers, and quantify it. If the Company contends that it cannot perform any of these calculations, state what data would be required, whether the Company possesses it, and why the calculation was not performed before the Company asserted in ALLCO-098(c) and (d) that "[t]here is no cost-benefit asymmetry" and that existing mechanisms "already align" costs and savings.

Response:

Eversource objects to this request. The requested information regarding generation purchased by the Company under PURA-approved contracts is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a

material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertains to generation purchased by the Company under PURA-approved contracts, which is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and

divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(The claimed ratepayer benefit of load-reducer treatment.) The Company stated in ALLCO-040, and ALLCO-041, that treating distribution-connected resources under five megawatts as unregistered load reducers "produces benefits for customers by reducing wholesale load obligations," and in ALLCO-087, that it is the "general Company practice to not register" such resources with ISO-NE and that this practice has been "acknowledged and accepted by PURA." Explain how the Company's treatment of projects under 5 MW as load reducers results in benefits to ratepayers, and in doing so: (a) identify the customers who receive the benefit — the Company's Standard Service and Last Resort Service customers, customers of third-party suppliers, all distribution customers, or some other group — and quantify the benefit to each group for each year 2020 through 2025 in megawatt-hours, in capacity megawatts, and in dollars; (b) identify the docket, decision, or ruling in which the Authority "acknowledged and accepted" the practice of not registering resources under 5 MW, and produce it; (c) compare the treatment in (a) with the treatment that would result if a facility whose output the Company purchases were registered as a Settlement Only Resource — in which case its metered output would be settled at the locational marginal price to the account of the Company as purchaser — and state whether the Company has ever evaluated registering, as Settlement Only Resources or otherwise, facilities whose output it purchases under buy-all tariffs or power purchase agreements, so that the energy and capacity value of that output accrues to the customers who pay for it; produce each such evaluation or state that none exists; (d) state whether the Company's load forecasts used for Standard Service procurement, and the Standard Service bids it receives, reflect the load-reducing effect of behind-the-meter generation, and if so how, so that the Authority can determine whether the claimed benefit reaches Standard Service customers in the price they pay; and (e) state whether the Company's statement in ALLCO-087, that "no individual or group determines" whether a resource under 5 MW is registered with ISO-NE remains accurate, and if so identify the person or group responsible for the Company's compliance with ISO-NE registration and metering requirements for distributed resources.

Response:

Eversource objects to this request. The requested information regarding the treatment of distributed energy resources as load reducers is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-

rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertains to the treatment of distributed energy resources as load reducers, which is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility

Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would imposse uneccesary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Load settlement systems and the Omni conversion.) (a) Identify each Load Settlement System used for the Company's Metering Domain in each year 2019 through 2026, its vendor, the ESC or Company organization that operates it, the number of personnel assigned, and the portion of its cost charged or allocated to the Company in the Test Year and Rate Year, with schedule references; (b) state whether the Omni retail billing platform, or the same platform under another name, has been or is scheduled to be implemented for the Company's Connecticut customers, the actual or scheduled implementation date, the project budget and amounts spent through the most recent date available, the amount included in the Test Year, Test Year Pro Forma, or Rate Year (expense or plant), and the schedule and workpaper references; (c) state whether the Load Settlement System used for the Company is the same system (Retail Operations, developed by Hitachi) that Eversource Energy identified in EL26-5 as the system NSTAR Electric Company uses, and whether the defects described in EL26-5 — load "assigned to the same accounts multiple times" and "a doubling of customer loads for certain commercial, industrial, and residential customers" — were present in, tested for, or corrected in the Company's system; and (d) describe the "enhanced monitoring, validation, and review procedures for load settlement data" that Eversource Energy told the Commission NSTAR has implemented, state whether and when each was implemented for the Company's Metering Domain, and produce the procedures.

Response:

Eversource objects to this request. The requested information regarding load settlement is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a

material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertains to load settlement, which is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory

timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Meter Data Errors and resettlements in the Company's Metering Domain.) For each calendar year 2019 through 2026 (year to date), state in native format: (a) the number of Meter Data Error correction requests, Requested Billing Adjustments, and resettlement submissions made by or on behalf of the Company as Assigned Meter Reader or Host Participant for its Metering Domain, the month(s) of load affected, the megawatt-hours and dollar amount of each correction, and the Load Assets (by LSE category: Standard Service, Last Resort Service, third-party supplier) whose load was increased or decreased; (b) the number of inquiries, disputes, or complaints received from licensed third-party suppliers concerning the load assigned to their Load Assets, and their disposition; (c) whether any error in the Company's reported load affected the load assigned to the Company's Standard Service or Last Resort Service Load Assets, the megawatt-hours and dollar effect, and how any resulting over- or under-collection was treated in the Standard Service, Last Resort Service, or Generation Services Charge reconciliations; (d) whether the Company's reported load affected the Company's or any supplier's Renewable Portfolio Standard obligation under Conn. Gen. Stat. § 16-245a, and whether any correction was reported to the Authority or the Department of Energy and Environmental Protection; and (e) each notice given to the Authority, the Office of Consumer Counsel, or ISO-NE concerning errors in the Company's load settlement data since January 1, 2024, with the date and a copy.

Response:

Eversource objects to this request. The requested information regarding reported load and load settlements is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a

material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertains to reported load and load settlements, which are not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would imposse uneccesary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory

timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(The Load Settlement Report and EL26-5 — facts and costs.) Without regard to any privilege claimed for the report itself: (a) state whether the Internal Audit review of the ISO-NE load settlement process that the Company identified in ALLCO-065, through ALLCO-067 (requested April 25, 2025; engagement memorandum May 19, 2025; final report January 7, 2026) examined the Company's Connecticut Metering Domain, the NSTAR Metering Domains, or both, and whether it examined the Omni-related defects at issue in EL26-5; (b) state whether the Company's response to ALLCO-068, — that EL26-5 is the only litigation and that it concerns load settlement "solely in Massachusetts" — remains accurate in light of the fact that Eversource Energy, the parent whose service-company costs are allocated to the Company, is a named respondent, and identify every other complaint, dispute, or proceeding since January 1, 2024 concerning load settlement data reported by any Eversource electric distribution company; (c) state the total cost incurred by Eversource Energy, ESC, NSTAR, and the Company in connection with EL26-5 and the related reconciliation work described in Eversource's March 6, 2026 answer (dedicated processing environment; rerunning settlement data; integrity checks; meetings with the Massachusetts Department of Energy Resources), including outside counsel, consultants, vendor remediation, and internal labor, and the portion of each charged or allocated to the Company, with FERC account and schedule references; and (d) state whether any cost of remediating load settlement defects, of resettling Massachusetts invoices, or of defending EL26-5, is included in the Test Year, Test Year Pro Forma, or Rate Year cost of service of the Company, directly or through ESC allocation, and if so the amount and the basis for charging it to Connecticut customers.Interconnection Applications Referred to ISO New England for Transmission-Level Review.

Response:

Eversource objects to this request. The requested information regarding metering domains and load settlements is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow

repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertains to load settlements and metering domains, which are not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting

the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Guideline timelines on the Spencer Hill Applications and on all applications over 1 MW.) The Spencer Hill Applications were submitted through PowerClerk on January 10, 2024. The Company gave notice that a feasibility study was required on July 18, 2024 (190 days later; the Guidelines' Executive Summary provides 15 Business Days for initial review); delivered the feasibility study on February 6, 2025 (185 days after the signed agreement and $7,500 fee were returned on August 5, 2024; the agreement's Exhibit B states a duration of 30 Business Days); gave notice on September 23, 2024 that a Distribution System Impact Study was required and received the executed agreement and $85,000 fee on September 25, 2024; and has delivered no system impact study, transmission study, facilities study, or Interconnection Agreement as of the date of these interrogatories. (a) For each of those steps, state the Guideline or study-agreement timeline the Company contends applied, the date it expired, the reason the step was not completed within it, and whether the Company gave the applicant the notice, explanation, and estimated completion date that Section 5.1 of the Guidelines requires when a deadline is missed, with the date of each such notice. (b) For every application over 1 MW received since January 1, 2020, state in native format the elapsed days from application to the Company's first substantive notice, from feasibility study agreement to feasibility study delivery, and from system impact study agreement to system impact study delivery, and the number and percentage of applications for which each Guideline timeline was met. (c) Identify the person(s) by title responsible in 2024, 2025, and 2026 for monitoring compliance with the Guideline timelines for applications over 1 MW, and each report of non-compliance made to Company management or the Authority.

Response:

Eversource objects to this request. The requested information regarding specific interconnection applications and the personnel who administered those applications is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence."

Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertains to specific interconnection applications and the personnel who administered those applications, which is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution

of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(The 20 MW substation threshold and the Level III transmission study requirement.) On October 24, 2024 the Company's project manager stated: "Any generator greater than 1 MW connected to a substation with 20 MW of DER on line and in the queue is required by ISO-NE to conduct a Level III transmission study. In this case this project is fed from Campville 14R substation with 62 MW of DER on line and in the queue, therefore a Level III transmission study is required," and on November 5, 2024 that "[t]here is currently 43.5MW in queue and 18.7 on line"; Exhibit A to the System Impact Study Agreement dated September 18, 2024 states "Bulk substation DER online & in Queue 18.5 MW / 38.4 MW." ISO New England's Participant Support group stated on November 13, 2024 that the Transmission Owner "provides information to the ISO on the generator(s) requesting interconnection … and the ISO determines the electrical proximity and need for/level of analysis based on that information." State: (a) the ISO-NE Planning Procedure, Tariff section, or other written authority, by section and effective date, on which the Company relies for the 20 MW threshold and for treating the sum of "on line and in the queue" distributed generation as the measure against that threshold, and produce it; (b) for each Spencer Hill Application, the date on which the Company submitted a Generator Notification Form, Proposed Plan Application, PP5 notice, or other information to ISO-NE, what was submitted, the date and content of each ISO-NE response, and specifically whether ISO-NE — as distinct from the Company — determined that a Level III analysis was required, and on what date; (c) whether the Company's practice is to make the Level III determination itself before submitting any notice to ISO-NE, and if so since when, under what written procedure, and whether that practice has been reviewed by the Authority; (d) reconcile the 62 MW, 56.9 MW (18.5 + 38.4), and 62.2 MW (18.7 + 43.5) figures the Company gave within six weeks, and state the date as of which each was measured; (e) in native format, each distributed generation project over 1 MW "on line" or "in the queue" at the Campville 14R substation as of October 24, 2024 and as of the date of response (applicant identities other than Allco may be anonymized), with its nameplate capacity, application date, PowerClerk status, whether it was required to undergo a Level III transmission study, the dates that study began and ended, and whether it has been interconnected; and (f) for each year 2020 through 2025, the number of applications over 1 MW that the Company determined required a Level III transmission study, the number that have completed that study, the average and median elapsed time from determination to study completion, and the number that withdrew while awaiting the study.

Response:

Eversource objects to this request. The requested information regarding timelines associated with a specific interconnection application, as well as an overly broad, unduly burdensome, and repetitive request concerning other third-party interconnection applications, is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition."

Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertaining to interconnection applications is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994). As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(The study agreements, the fees, and the ISO-NE cluster study schedule.) The Feasibility Study Agreement for the Spencer Hill Applications (Effective Date July 18, 2024; fee $7,500) stated that the feasibility results "will be included in an impact study agreement for a Level III T&D study with a cost of $75,000." The System Impact Study Agreement that followed (Effective Date September 18, 2024) priced the study at $85,000; its Exhibit B, § 6, required a PSCAD model; its Exhibit C stated "Duration of Study: ASO Study timelines," "[t]he study clock starts once a working model is received (PSCAD)," and "[t]he next ASO study is expected to begin in Fall 2025"; and the September 23, 2024 PowerClerk notice repeated that the project "will be included in the next available ISO-NE cluster study as determined by ISO-NE." In September 2025 the Company advised that the projects were waiting for a group transmission study "which will begin in January 2026," and that inclusion in the 2025 study would have required PSCAD models approved before October 2024 — a cut-off that appears in none of the documents just quoted. State: (a) how the $75,000 and $85,000 figures were determined, why the figure increased between July and September 2024, the components each covers (distribution system impact study, transmission study, PSCAD model review, ISO-NE charges, or other), the account in which the $85,000 is held, the amount expended against it to date with supporting detail, and whether any unexpended balance earns interest for the applicant; (b) the name, ISO-NE designation, scheduled and actual start date, scheduled and actual completion date, and number and aggregate megawatts of projects in each ISO-NE cluster, ASO, or group transmission study in which any Company distribution interconnection application has been included since 2022, and the study in which the Spencer Hill Applications are now included, with its current expected completion date; (c) the date on which the Company knew that models had to be approved by October 2024 for inclusion in the 2025 study cycle, why that cut-off was not stated in the September 2024 agreement or notice, and the date on which it was first communicated to the applicant; (d) the number of applications that missed inclusion in an ISO-NE study cycle since 2022 because a Company requirement or cut-off was communicated after the cycle closed, and the resulting delay for each; and (e) whether the "ASO Study timelines" that govern the duration of the study under Exhibit C are published, and if so produce the schedule in effect on September 18, 2024 and today.

Response:

Eversource objects to this request. The requested information regarding a specific interconnection application, as well as an overly broad, unduly burdensome, and repetitive request concerning other third-party interconnection applications, is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition."

Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertaining to a specific interconnection application, as well as its overly broad, unduly burdensome, and repetitive request concerning other third-party interconnection applications, is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public Utility Control, 44 Conn. Supp. 21, 26-27 (1994)[1]. As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

[1] PURA has also previously ruled that interrogatories must pertain to the evidence and testimony submitted by a witness in the proceeding. See, Ruling on Motion No. 73, Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend Their Rate Schedules, April 3, 2024, citing, General Statutes § 4-177c(a)(2); Motion Ruling Nos. 15 and 17, Jan. 2, 2009, Docket No. 08-07-15, Petition of the Office of Consumer Counsel for Enforcement of Quality of Service Standards for The Southern New England Telephone Company d/b/a AT&T Connecticut.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

(PSCAD model handling and PowerClerk notices.) The applicant delivered PSCAD models for the Spencer Hill Applications on November 14, 2024, again on December 18, 2024, and again on March 31, 2025; on March 31, 2025 the Company's manager wrote that "we were never sent the PSCAD models"; the Company states that it posted a model deficiency notice in PowerClerk on December 18, 2025, no e-mail of which the applicant received or the Company has been able to locate (the Company citing turnover in its engineering group); the Company first described the deficiencies by e-mail on March 18, 2026; revised models were delivered May 29, 2026 and accepted June 2, 2026. State: (a) the date on which the Company's records show each delivery of the models was received, by whom, and the date on which each was reviewed; (b) whether PowerClerk is configured to send an e-mail to the applicant when a deficiency notice or other status change is posted, whether that configuration was in effect on December 18, 2025, and whether the Company has audited whether such notices were delivered to applicants between October 2025 and May 2026, with the results; (c) the number of applications for which a Company request for additional information or a deficiency notice remained unanswered for more than 90 days between January 1, 2024 and the present, and whether the Company followed up in each case; (d) the number of engineers and project managers (employees and contractors, including Burns & McDonnell personnel) assigned to transmission-level review of distributed generation applications in each year 2023 through 2026, the turnover in that group, and the cost of the group charged to the Company in the Test Year and Rate Year, with schedule references; and (e) whether the Company contends that any portion of the delay in the Spencer Hill Applications since September 25, 2024 is attributable to the applicant, and if so the specific period and reason.

Response:

Eversource objects to this request. The requested information regarding a specific interconnection application, as well as an overly broad, unduly burdensome, and repetitive request concerning other third-party interconnection applications, is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertaining to a specific interconnection application, as well as its overly broad, unduly burdensome, and repetitive request concerning other third-party interconnection applications, is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public

Utility Control, 44 Conn. Supp. 21, 26-27 (1994)[1]. As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

[1] PURA has also previously ruled that interrogatories must pertain to the evidence and testimony submitted by a witness in the proceeding. See, Ruling on Motion No. 73, Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend Their Rate Schedules, April 3, 2024, citing, General Statutes § 4-177c(a)(2); Motion Ruling Nos. 15 and 17, Jan. 2, 2009, Docket No. 08-07-15, Petition of the Office of Consumer Counsel for Enforcement of Quality of Service Standards for The Southern New England Telephone Company d/b/a AT&T Connecticut.

Date Filed: November 02, 2026

Witness: Counsel
Request from: ALLCO

Question:

INT-60394 was submitted on February 28, 2022 for 2,000 kW AC, which was reduced to 1MW by the applicant. After the applicant reduced the project to 1,000 kW, the Company issued a Contingent Approval dated July 9, 2024 and an Interconnection Agreement whose Appendix G, estimated construction cost at $281,719, composed of "New Service and recloser $241,137," "CIAC - 16% … $38,582," and a $2,000 witness test, and which noted that "additional upgrades will be required if the project ahead in the queue does not proceed," including conversion of Spencer Street and Spencer Hill Road from 4.8 kV to 23 kV and station regulator upgrades at Winsted 33B and Huntington Road 28P. The applicant returned the executed Interconnection Agreement and Schedule of Milestones on September 6, 2024. State: (a) whether the Company has countersigned that Interconnection Agreement, and if so the date and the date it was transmitted to the applicant; if not, why not, and what the PowerClerk status "Awaiting Fulfillment of Milestone Requirements and Municipal Approval" contends remains outstanding; (b) the Company's practice and average elapsed time, for all applications since January 1, 2020, between receipt of a generator-executed Interconnection Agreement and the Company's countersignature, and the number of agreements that have remained uncountersigned for more than 90 days, 180 days, and one year; (c) what the "CIAC - 16%" line represents, how the 16 percent rate was derived, whether it is the same percentage overhead that the Company's December 2024 Final Accounting Reports for other Allco clusters described as having been "allocated at time of deposit" and "refunded in full," and the percentage applied to every Interconnection Agreement issued in each year 2020 through 2026; and (d) the identity (anonymized) and status of the "project ahead in the queue," the estimated cost of the upgrades it is responsible for, the deadline by which it must proceed, and the written procedure by which those costs would be reassigned to INT-60394, or any other later applicant if it does not.

Response:

Eversource objects to this request. The requested information regarding a specific interconnection application, as well as an overly broad, unduly burdensome, and repetitive request concerning other third-party interconnection applications, is not probative of any material or disputed issue relevant to the Company's application in this proceeding, which PURA is conducting as a general distribution rate proceeding pursuant to Conn. Gen. Stat. § 16-19, to amend the Company's base-rate schedules. Absent such a connection, the requested information is not reasonably calculated to advance the evidentiary record upon which PURA must base its decision.

The purpose of discovery is to provide PURA, the parties, and intervenors with access to relevant, probative information necessary to develop a complete and accurate record -- not to allow repetitive or irrelevant requests that divert time and resources from that objective. By statute, administrative agencies must exclude "irrelevant, immaterial or unduly repetitious evidence." Conn. Gen. Stat. § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a). Connecticut judicial precedent explains that evidence is relevant only if it has a tendency to establish the existence of a material fact. United Technologies Corp. v Commission on Human Rights & Opportunities, 72 Conn. App. 212, 229 (2002). Discovery must advance the efficiency of the proceeding and provide the factual foundation upon which an agency decision may rely. Therefore, a party is required to produce discovery documents only if they are "material and necessary to [an] action." Dotson v. Hartford Roman Catholic Diocesan Corp., No. CV106012742S, 2011 WL 1021745, (Conn. Super. Ct. Feb. 17, 2011) (citing, Berger v. Cuomo, 230 Conn. 1, 7 (1994)); see also Conn. Gen. Stat. § 4-177c(a)(1) (permitting discovery of "relevant and material records, papers and documents[.]").

Additionally, discovery "does not afford an open invitation to delve into [CL&P's] affairs". J. Pub. Co. v. Hartford Courant Co., 261 Conn. 673, 681 (2002). Allco "must be able to demonstrate good faith as well as probable cause that the information sought is both material and necessary" to this rate case. Id. Practice Book § 13-2, which defines the scope of discovery, provides in relevant part that a party may only seek discovery of nonprivileged information that is "material to the subject matter involved in the pending action . . . ." "It is axiomatic that [e]vidence is admissible only to prove material facts, that is to say, those facts directly in issue or those probative of matters in issue; ***evidence offered to prove other facts is immaterial***." Salmon v. Dept. of Public Health & Addiction Services, 259 Conn. 288, 316 (2002) (internal quotation marks omitted; emphasis added.)

Further, discovery may not be used to conduct an unrestricted search for information. As the Connecticut Supreme Court has explained, a party "should not be allowed to indulge a hope that a thorough ransacking of any information and material which . . . [CL&P] may possess would turn up evidence helpful to [his] case". J. Pub. Co. v. Hartford Courant Co., 261 Conn. at 681. Simiarly, "[i]nterrogatories should not be used to . . . permit a party to go on a fishing expedition." Mfr.'s Advert., Inc. v. Pancoast, 4 Conn. Cir. Ct. 668, 670 (1967) (internal quotation marks omitted).

Here, Allco's request pertaining to a specific interconnection application, as well as its overly broad, unduly burdensome, and repetitive request concerning other third-party interconnection applications, is not relevant to PURA's evaluation of either the Company's application as a whole or its proposed revenue requirement. Thus, the information requested in this interrogatory is not relevant or material to the Company's rate application as it does not advance the factual foundation upon which PURA's decision will rely. Office of Consumer Counsel v. Department of Public

Utility Control, 44 Conn. Supp. 21, 26-27 (1994)[1]. As the information is irrelevant and immaterial, this discovery must be excluded. See General Statutes § 4-178(1); see also Conn. Agencies Regs. § 16-1-38(a).

In addition, the statutory 350-day timeframe for issuing a final decision on the Company's application, coupled with the volume of interrogatories issued, strongly weighs against devoting the time and resources of the parties and PURA to discovery that does not advance the resolution of this proceeding. Requiring the Company to collect, review, and produce information that has not been shown to be material or relevant would impose unnecessary administrative burdens and divert resources from the important issues PURA must evaluate and resolve within the statutory timeframe. Accordingly, in the interest of the orderly and efficient conduct of this proceeding, Eversource respectfully requests that this objection be sustained.

[1] PURA has also previously ruled that interrogatories must pertain to the evidence and testimony submitted by a witness in the proceeding. See, Ruling on Motion No. 73, Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend Their Rate Schedules, April 3, 2024, citing, General Statutes § 4-177c(a)(2); Motion Ruling Nos. 15 and 17, Jan. 2, 2009, Docket No. 08-07-15, Petition of the Office of Consumer Counsel for Enforcement of Quality of Service Standards for The Southern New England Telephone Company d/b/a AT&T Connecticut.