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May 20, 2026

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-05-XX - Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules – Request for Waiver of Certain Standard Filing Requirements

Dear Mr. Gaudiosi:

The Connecticut Light and Power Company d/b/a Eversource Energy (the "Company") has on this date issued a notice ("Notice of Intent") with respect to its plan to file a rate application pursuant to § 16-19 of the Connecticut General Statutes. Pursuant to the provisions of § 16-1-53a of the Regulations of Connecticut State Agencies ("R.C.S.A.") and Paragraph 2.4 of Chapter 2 of the Public Utilities Regulatory Authority's ("PURA") Standard Filing Requirements for Large Public Utility Companies ("SFRs"), the Company respectfully requests a waiver of strict compliance with certain portions of the SFRs.

As stated in the Company's Notice of Intent, the Company is requesting an increase in rates with new rates effective on or before July 1, 2027. The specific SFRs for which a waiver is requested, as well as the specific reasons in support of each request, as required by Paragraph 2.4, are set forth below.[1]

1. SFR Description

B-2.3 Summary of Jurisdictional Allocation Factors
B-2.4 Jurisdictional Allocation Statistics
B-2.5 Explanation of Changes in Jurisdictional Allocation Procedures
C-2.1 Allocation Factors
C-2.2 Allocation Statistics
C-2.3 Explanation of Changes in Allocation Procedures

[1] Paragraph 2.4 of the SFRs states in relevant part, "Upon written request, the DPUC may grant a waiver of any of the SFRs' provisions where good cause is shown by the utility."

Reason for Waiver

The above schedules request information for data that does not exist for the Company since all retail allocation factors are 100%.

2. SFR Description

B-10.0 Capitalized Conservation
B-11.0 Other - Bonus Rate of Return

Reason for Waiver

The Company does not have capitalized conservation. Therefore, the above schedules are not applicable.

3. SFR Description

G-4.0 Maximum Net Capability for System Peak Coverage
G-4.2 Megawatthours (MWH) Generation Statistics
G-4.4 Capacity Sales

Reason for Waiver

The Company does not currently own any generation. Therefore, the above schedules are not applicable.

4. SFR Description

F-1.0 - Forecast Income Statement - Current Rates
F-1.1 - Forecast Income Statement - Proposed Rates
F-2.0 - Forecast Rate Base Summary - Current Rates
F-2.1 - Forecast Rate Base Summary - Proposed Rates
F-2.2 - Forecast Plant-In-Service by Major Property Grouping - Current Rates
F-2.3 - Forecast Plant-In-Service by Major Property Grouping - Proposed Rates
F-3.0 - Forecast Capital Structure - Current Rates
F-3.1 - Forecast Capital Structure - Proposed Rates
F-4.0 - Forecast Statement of Receipts and Disbursements of Funds Total Company (Rate Year)
F-4.1 - Forecast Statement of Receipts and Disbursements of Funds Total Company (Three Projected Calendar Years Subsequent to Test Year)
F-5.0 - Times Interest Charges Earned Before Income Taxes – Total Company

F-6.0 - Forecast Revenue and Customer Statistics
F-6.1 - Forecast Sales Statistics
F-6.2 - Impact of a 1% Change in Sales
F-7.0 - Capital Expenditures Budget
F-8.0 - Forecast Comparative Income Statement and Balance Sheet
F-9.0 - Summary of Key Indenture Limitations and Preferred Stock Limitations

Reason for Waiver

In numerous instances, Schedule F to the SFRs states that the forecasted financial data required by Schedule F must be submitted on a "calendar year" basis (see, e.g., SFRs, Schedule F at §§ 1.4, 1.5 and 1.7). However, in other instances, the SFRs are silent as to whether to use calendar year data (see, e.g., SFRs, Schedule F at §§ 1.1 and 1.2). As a result, with respect to the forecasted financial data required by Schedule F of the SFRs, the Company requests that PURA re-affirm that the Company can submit such data to PURA in this rate case proceeding on a calendar year basis reflecting the 12-month period ending December 31st. This approach is identical to the approach PURA approved in the Company's last three rate cases in Docket Nos. 17-10-46, 14-05-06 and 09-12-05.[2] Moreover, this approach is necessary because all of the Company's financial forecasts are prepared on a calendar year basis, not on other 12-month periods. The Company therefore requests PURA's approval (and, to the extent applicable, a waiver under the SFRs) for the Company to submit the forecasted financial data required by Schedule F of the SFRs on a calendar year basis reflecting the 12-month period ending December 31st.

5. Conclusion

The Company believes that the granting of the above requested waivers is reasonable and consistent with the purpose of the SFRs, which are designed "to assist the Authority in performing a thorough and expeditious review of applications for revenue requirement changes." SFRs at Paragraph 2.1. These waivers will not limit the ability of PURA or other participants to obtain relevant information necessary for consideration of the Company's filing.

[2] See Docket No. 17-10-46, Application of The Connecticut Light and Power Company to Amend Rate Schedules, November 2, 2017 Ruling on Motion No. 2 at page 1; Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend Rate Schedules, May 20, 2014 Ruling on Motion No. 1 at page 1 (stating "Additionally, the Authority grants the Company's request to clarify that certain schedules may be submitted on a calendar year basis, for those schedules that the SFRs do not specify to use calendar year data."); Docket No. 09-12-05, Application of The Connecticut Light and Power Company to Amend Its Rate Schedules, December 29, 2009 Ruling on SFR Waiver Request at Page 2 ("Finally, CL&P has requested that the Department allow the Company to submit data required in F-1.0 through F-9.0 of the SFR's on a calendar year basis reflecting the 12-month period ending December 31st. The Department approves CL&P's request regarding the F schedules.")

Thank you for your attention to this matter.

Very truly yours,

Vincent P. Pace

Vincent P. Pace
Daniel T. Crisp
Lauren H. Bidra
On Behalf of CL&P d/b/a Eversource Energy

cc: Claire E. Coleman, Office of Consumer Counsel
Service List