Date Filed: September 14, 2026

Witness: Lavelle A. Freeman, Juan F. Martinez, and Steven C. Osuch
Request from: ALLCO

Question:

With respect to the contemplated "Bul Substation near Hampton" (Exhibit CLP-TSP-3 at 146): state its proposed scope, cost estimate, and in-service timing; identify the in-queue projects it is intended to enable, including their application dates and queue positions; and state how projects with pending applications at the Card Street 11F substation or on Circuit 11F14 ― including applications pending since 2017 and 2018 ― would be treated under the SHARE proposal, including whether and how amounts previously paid by such earlier-queued customers (deposits, study fees, CIAC, and upgrade payments) would be credited against any SHARE fee.

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, as outlined in Exhibit CLP-TSP-3 at 146, the proposed new bulk substation would be needed to support Tracy 14M, Brooklyn 30Y, and Mansfield 12J. This project is intended to safely and reliably accommodate large-scale DER growth in the area served by the three existing substations, improve system reliability, and resolve capacity constraints due to recent commercial load growth in the region. The preliminary scope of the project includes construction of a new bulk substation with two standard size transformers supplied by transmission sources, and new distribution feeders to pick up loads from the other aforementioned substations in the group, accommodate new loads, connect in-queue DER and enable future DER connections. The project is still in the very early planning stage and no system studies, engineering design or detailed cost estimates have been performed to determine detailed scope, equipment needs, site requirements, resource availability, procurement and construction schedules and myriad other issues that can affect cost and schedule. Therefore, it is not possible, at this preliminary stage, to provide more granularity on scope, cost estimate, and in-service timing than included in Exhibit CLP-TSP-3.

If the project were to be constructed today, the in-queue projects it would be intended to enable, including application dates and queue position are available for each of the three substations in the

published CT DER Queue located on the Company's Connecticut Application to Connect website.[1]

As there are no projects in-queue at the Card Street 11F substation impacted by the preliminary design of this project, it is not possible to say specifically how they would be treated under this SHARE proposal. However, in general, the $/kW SHARE fee would not apply to Level 1 projects. All other projects interconnecting to the group of stations (existing and new) will be required to pay the $/kW SHARE fee which is intended to recover the portion of the cost of common distribution upgrades allocated to DER customers from current (in-queue) and future DER benefiting from those upgrades. This fee does not replace any additional fees associated with interconnection including, but not limited to, application fees, study fees, point-of-interconnection costs or individual or project upgrade requirements identified by a system impact study, such as the installation of a DER Gateway and other project-specific upgrades.

If the SHARE Program is approved, the Company will work with stakeholders to develop a Group Study Agreement that outlines how projects with pending applications would be treated including whether and how amounts previously paid by such earlier-queued customers (deposits, study fees, CIAC, and upgrade payments) would be handled.

[1] https://www.eversource.com/residential/about/doing-business-with-us/interconnections/connecticut/connecticut-application-to-connect