Date Filed: September 14, 2026

Witness: Danielle Munson
Request from: ALLCO

Question:

The Office of Consumer Counsel has requested extensive discovery regarding variable, incentive, and executive compensation generally (see, e.g., OCC-199, OCC-202, OCC-286 through OCC-300, OCC-369, and OCC-370), which Allco does not repeat. Allco asks only: state whether any portion of executive compensation, variable (incentive) compensation, or Eversource Energy Service Company charges is included in the overhead rates, loaders, or general and administrative components applied to interconnection project costs charged to interconnection customers as CIAC or "overheads"; if so, identify each loader component and its rate, and quantify the amounts so charged to interconnection customers in each year 2020 through 2025.

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, with respect to Eversource's executive management, there is no portion of their compensation included in the overheads and/or loaders charged to interconnection projects.