Date Filed: October 01, 2026

Witness: Andrew C. Belden
Request from: ALLCO

Question:

(Follow-up to ALLCO-040.) The response omitted the decision-making the interrogatory asked about. Identify, by title, each person or group who determines whether a distribution-connected resource under five megawatts is registered in ISO-New England or treated as an unregistered load reducer, and state the criteria applied; identify and produce every analysis, evaluation, or quantification the Company has performed of the customer-cost consequences of registering versus not registering such resources — including any analysis underlying the position PURA approved in Docket No. 20-07-01 and any quantification of the "benefits for customers" the response describes — or state that no such analysis exists; and identify each exception to the Company's "general practice," i.e., each distribution-connected resource under five megawatts that is or has been registered in the ISO-New England markets since 2020, stating its size, program, and the reason for registration.

Response:

PURA's June 2, 2026, Notice of Proceeding in Docket No. 26-05-10 states that, upon a receipt of a completed application from Eversource to amend the Company's existing rate schedules, PURA will conduct a contested proceeding to review Eversource's application. Eversource objects to Allco's effort to litigate an issue that is outside the scope of this rate case proceeding. Considering the statutory 350-day timeframe to issue a final decision on the Company's application and the number of interrogatories issued in this proceeding to-date, the litigation of issues irrelevant to the Company's application threatens to adversely impact the orderly conduct of this proceeding.[1]

Without waiving said objection, there is not an individual or group that determines whether a distribution-connected resource under five megawatts is registered in ISO-NE or treated as an unregistered load reducer. It has been general Company practice to not register resources under 5 MW, and this approach has been acknowledged and accepted by PURA.

Registering versus not registering distributed generation does not change the underlying operation of a distributed generation resource or its physical impact to the electric power system. The reduction to wholesale load obligations described as a customer benefit in the Company's response to ALLCO-040 is equal to the excess generation from unregistered resources. If a distributed

[1] Allco previously litigated renewable energy projects as load reducers in the Company's Docket No. 24-01 03 Revenue Adjustment Mechanism proceeding. See, Docket No. 24-01-03, Eversource responses to ALLCO-04 and ALLCO-027. Eversource objected to both of these questions.

generation resource was registered, the same amount of energy would be sold within the wholesale market and resulting revenues credited to customers through operation of the Rate Adjustment Mechanism.

Please refer to the Company's response to ALLCO-089[i] for the single example of a registered distributed generation facility.

Prior Referenced Response:

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[i] ALLCO-089 Question:

(Follow-up to ALLCO-042.) Identify each resource constituting an exception to "substantially all" — that is, each eligible resource under five megawatts that was registered in ISO-New England rather than treated as an unregistered load reducer at any time during 2020 through 2025 — stating for each its nameplate capacity, program or contract, the period of registration, and the reason; and state whether the Company has ever evaluated, or been requested by any customer, developer, or agency to evaluate, changing the registration status of any category of such resources, identifying each evaluation or request and its disposition.

ALLCO-089 Response:

PURA's June 2, 2026, Notice of Proceeding in Docket No. 26-05-10 states that, upon a receipt of a completed application from Eversource to amend the Company's existing rate schedules, PURA will conduct a contested proceeding to review Eversource's application. Eversource objects to Allco's effort to litigate an issue that is outside the scope of this rate case proceeding. Considering the statutory 350-day timeframe to issue a final decision on the Company's application and the number of interrogatories issued in this proceeding to-date, the litigation of issues irrelevant to the Company's application threatens to adversely impact the orderly conduct of this proceeding.[1]

Without waiving said objection, 750 kW solar photovoltaic (PV) facility enrolled in the Virtual Net Metering Rider is registered as a settlement only generator at the request of the customer. The Company receives 100% of the energy revenue from the facility through the ISO-NE Market Settlement System, and these proceeds are credited to customers through the Rate Adjustment Mechanism.