STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

September 3, 2026
Docket No. 26-05-10

Re: Docket No. 26-05-10 - Application of CL&P dba Eversource Energy to Amend its Rate Schedules

Enclosed are interrogatories **EOE-138 through EOE-170** directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company"). The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) Office of Education, Outreach, and Enforcement (EOE) in connection with the above referenced docket and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **4pm on September 17, 2026**. If a response to any of the requested information has already been filed in response to another interrogatory response in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

EOE requests that all interrogatory responses be included in the same document, rather than responses to each interrogatory being filed as individual documents.

Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to Electronic Filing on the Authority's website for more information. **Paper filings will be accepted only if a person is unable to file electronically. The Authority reserves the right to request paper copies of certain filings at a later date.** No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by email using the following directions: confidential material must be emailed directly to **Jeff.Gaudiosi@ct.gov** in an email with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed publicly.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. § 1-200 et. seq. In those

exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion, a proposed protective order and nondisclosure agreement must be appended to the Motion. The Authority will rule on the Motion forthwith, and give further direction as necessary. Contact the Authority's Executive Secretary at (860) 827-1553 with questions regarding making a confidential filing.

The current service list for this docket is available on the Authority's website located at www.dpuc.state.ct.us/DPUCservlist.html.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach, and Enforcement

Enclosure
cc: Service List

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Sincerely,

By: /s/*Britany Wyman*
Brittany Wyman
Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

The following Interrogatories, designated as EOE-138 through EOE-170, are directed to The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource," or "Company").

EOE-138. (VEGETATION MANAGEMENT PROGRAM) Discuss the makeup of the Vegetation Management organization and provide a copy of the organizational chart.

EOE-139. (VEGETATION MANAGEMENT PROGRAM) Explain why the Company relies on external vendors in lieu of hiring employees responsible for actual tree trimming and tree removals.

EOE-140. (VEGETATION MANAGEMENT PROGRAM REDESIGN) Refer to Exhibit CLP-VMP-1. Respond to the following:

a. Explain how the Company's historical vegetation management program (VMP) has impacted the Company's vegetation-related storm staffing levels outlined within its Event Level Matrix (ELM).
b. Explain how the Company's proposed redesign to the VMP is expected to impact the Company's vegetation-related storm staffing levels outlined within its ELM.

EOE-141. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-VMP-1, pp. 16, 25-26. Identify the total amount of capitalizable Enhanced Tree Trimming (ETT) costs per year since 2018 through present split between (1) enhanced tree removals ("ETR"); (2) customer-focused ETT work; and (3) CTDOT work pursuant to the CTDOT vegetation standard. Additionally, identify the capitalization period (i.e., amortization period) for each type of work.

EOE-142. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-VMP-1, pp. 18-24. The Company identified seven types of components associated with CL&P's historical VMP. Please identify the historical cost breakdown between these seven components from 2018 through present.

EOE-143. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-VMP-1, p. 32. Respond to the following:

a. Does the Company track each instance where there are "limitations imposed during the scheduled maintenance trim"?
b. If response to subsection 'a' is yes, provide a current listing of these limitations.
c. If response to subsection 'a' is yes, provide details regarding the historical (i.e., 2018-present) instances where the referenced vegetation caused outages or damage to the Company's infrastructure.

d. For each occurrence identified within subsection ‘c’, identify if the Company attempted to recover damages from the property owner. If damages were not pursued, explain why.

EOE-144. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-VMP-1, pp. 28, 36. Respond to the following:

a. Identify the total test year cost for the Company’s execution of the ground-based LiDAR evaluation. Additionally, identify the total LiDAR evaluation costs that are included in the rate year and, if applicable, explain why the costs are expected to recur.
b. Explain the nature of the $950,000 LiDAR costs included on p. 36 and provide supporting calculations or other related documentation.

EOE-145. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-VMP-1, p. 39. The Company referenced the VMP Request For Proposal (RFP) process that is underway and is expected to be finalized in November 2026.

a. Provide a complete copy of the RFP request;
b. Explain where in the process the Company currently is;
c. Discuss how the Company notified potential bidders; and
d. Provide copies of all proposals submitted by vendors.

EOE-146. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-VMP-1, p. 45. The Company identified certain recommended changes to customer notifications that resulted from Docket No. 12-01-10. Identify the total estimated cost reductions to the VMP if the Authority were to approve the Company's request to provide notices in alignment with § 16-234.

EOE-147. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-VMP-1, pp. 46-47. The Company discussed "hazard and risk trees." Respond to the following:

a. Explain where the referenced "hazard and risk trees" are located (i.e., on rights of way or on private property).
b. Identify if there are circumstances where the Company could provide an arborist report to the property owner of "hazard and risk trees” assigning responsibility for, or defer, the costs of vegetation removal. Identify if the Company has allocated or collected any damaged infrastructure costs associated with "hazard and risk trees" to the customers.

EOE-148. (Reliability) Refer to Exhibit CLP-ELP-1, p. 47. Please explain how the Company calculates Customers Experiencing Multiple Interruption (CEMI).

EOE-149. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-ELP-1, p. 64. Please explain how the Company calculates Storm-CEMI.

EOE-150. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-ELP-1, p. 64. Please provide a list of the 100 highest Storm-CEMI from 2018 through 2025, individually.

EOE-151. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-ELP-1, p. 67. Please provide the cost benefit analyses the Company performed for determining reliability projects for the 2025 test year.

EOE-152. (VEGETATION MANAGEMENT PROGRAM) Refer to Exhibit CLP-VMP-1, p. 19. Please provide the Company's Scheduled Maintenance Trimming (SMT) program's scheduled circuits from January 1, 2022, through December 31, 2026. Include in the response an unlocked excel spreadsheet, for each year containing the following information:

a. Planned routes with start and end addresses;
b. Start and end date of work performed;
c. Contractor who performed the work; and
d. Emergent work with a description of the work performed and the date the work was performed.

EOE-153. (VEGETATION MANAGEMENT PROGRAM) For each year, from 2018 through 2025, please provide a list of external vegetation management contractors the Company has employed.

EOE-154. (VEGETATION MANAGEMENT PROGRAM) For each of the vendors the Company has provided in response to the above Interrogatory, EOE-153, please provide the applicable contract for the time period in which the contractor performed work.

EOE-155. (VEGETATION MANAGEMENT PROGRAM) For each year from 2018 through 2025, please provide the Company's total expenditure on vine control, in an unlocked excel spreadsheet, broken down by:

a. Year;
b. Cost per mile for each of the Company's programs (SMT, ETT, etc.);
c. Total cost allocated to each contractor.

EOE-156. (PBMRP CAPITAL SUPPORT MECHANISM) Refer to Exhibit CLP-ELP-1, pp. 101-103. Provide a working, unlocked Excel spreadsheet that would serve as a representative tool used to calculate the Company's incremental revenue requirements resulting from the proposed capital support mechanism (F-Factor) for each year of the MRP. As part of the submission, discuss the calculations and separately identify and explain all critical assumptions, using cited information from the Company's rate case

submission where relevant (e.g., depreciation rate from the Company's depreciation study). In support of the request, please use the Company's proposed 5-Year Targeted System Performance (TSP) Plan within the spreadsheet's initial inputs and apply an initial assumption that the Company incurred actual plant-in-service additions of 5% more than the proposed annual TSP funding. Additionally, please configure the spreadsheet to allow for the weighted average carrying costs (WACC) to be individually adjusted for both ROE and Cost of Debt.

EOE-157. (RECEIVABLES/UNCOLLECTIBLES) Refer to Response to EOE-061, Att.1 Redacted. The Memo referenced a Reserve Calculation Report (p. 2). Provide a working copy of the report as of December 31, 2025.

EOE-158. (ANNUAL REVENUE REQUIREMENTS) Refer to Response to EOE-064. The Company provided the authorized annual revenue requirements, excluding the authorized revenues associated with the Electric System Improvements (ESI) charges. Please supplement the response to include the authorized revenues associated with ESI.

EOE-159. (PROCUREMENT PROCEDURES) Refer to Response to EOE-046. The Company's response identified the requirements for purchases greater than $50,000 (i.e., competitive bids, sole source justifications, or documented exceptions) and included a note that states "[t]he requirement to document the exception was introduced in August of 2025." Explain why the documented exception process was only introduced in August of 2025 and discuss what standard(s) existed prior to the new requirement.

EOE-160. (PROCUREMENT-DOCUMENTED EXCEPTION) Refer to Response to EOE-046. Provide a detailed listing of all "Documented Exceptions" to the Procurement Policy and Procurement Manual as referenced on p. 4.

EOE-161. (PROCUREMENT-MINIMUM PROPOSALS) Refer to Response to EOE-046. The Company's response references the Procurement manual as requiring three bidders for transactions exceeding $50,000 but stated that "there is no strict mandate that a minimum number of completed proposals must be received." Discuss the Company's process for when fewer than three bids are received and identify if the Company monitors these situations. As part of the response, please provide a detailed listing of all competitive bids assessments where the Company received fewer than three proposals.

EOE-162. (APPROVAL LEVELS) Refer to Response to EOE-050. Explain how the Company monitors adherence to the Company's Delegation of Authority (DOA) policy to ensure that multiple purchase orders or contracts are not used in lieu of obtaining higher levels of approvals.

EOE-163. (APPROVAL LEVELS) Refer to Responses to EOE-050 and EOE-054. Identify why the following vendor example was subject to multiple purchase order (PO) numbers where each of the PO values were below the procurement agent's approval limits. As part of the response, please provide any correspondence or other documentation demonstrating approval by an individual with the correct authority level:

PONUM	VENDOR NAME	PO VALUE	APPROVAL DATE
13315849	SUMMIT HANDLING SYSTEMS INC	$99,864	2/5/2025
13312300	SUMMIT HANDLING SYSTEMS INC	$99,864	1/24/2025
13310146	SUMMIT HANDLING SYSTEMS INC	$99,864	1/15/2025
13309415	SUMMIT HANDLING SYSTEMS INC	$99,864	1/15/2025

EOE-164. (MILESTONE PAYMENTS) Refer to Response to EOE-56. The Company's response stated that the "Company does not generally support milestone payments prior to work being performed or costs being incurred by the Company's vendor…" Provide a listing of all procurements that included milestone payments, along with the rationale for why the payments were permitted. As part of the response, please identify the vendor, the contractual amount, and the payment amount that would be at risk.

EOE-165. (COMPETITIVE BID ASSESSMENTS) Refer to Response to EOE-051, Att.1. The Company's response identified that "supporting procurement records are maintained at the Purchase Order or Contract level rather than the Supplier level." Please supplement EOE-051, Att.1 with a detailed listing of the applicable purchase order or contract numbers and identify whether the POs or contracts were subject to a competitive bid or sole source approval.

EOE-166. (COMPETITIVE BID ASSESSMENTS) Respond to the following:

a. Explain how the Company ensures that each purchase order or contract is subject to a competitive bid assessment, sole source justification, or an approved exception. As part of the response, please discuss whether there are any systemic controls, including the use of Ariba, that ensure adherence to these requirements and, if applicable, provide an example of the referenced controls.

b. Explain how the Company ensures adherence to the Company's competitive bid requirements for situations where multiple purchase orders or contracts could be used in lieu of the referenced controls discussed in subsection a.

EOE-167. (COMPETITIVE BID ASSESSMENTS) Refer to Response to EOE-054. Identify why the following vendor example was subject to multiple purchase order (PO) numbers where each of the PO values were below the competitive bid threshold (i.e., $50,000). As part of the response, please provide any correspondence or other documentation demonstrating that a competitive bid has occurred.

PONUM	VENDOR NAME	PO VALUE	APPROVAL DATE
13242176	HARTFORD ELEVATOR LLC	$49,750	5/17/2024
13245536	HARTFORD ELEVATOR LLC	$49,900	5/31/2024
13133137	HARTFORD ELEVATOR LLC	$49,900	5/11/2023
11150160	HARTFORD ELEVATOR LLC	$49,900	12/9/2021

EOE-168. (COMPETITIVE BID ASSESSMENTS) Refer to Response to EOE-051, Att.1. Explain why the Company's attachment could include multiple vendors with an annual spend of more than $50,000 that were both exempt from competitive bid requirements and sole source justifications. As part of the response, specifically comment on the following examples:

a. Chris Witham Construction Services LLC;
b. Emcor Services;
c. Extra Duty Solutions; and
d. S-1 Mechanical LLC

EOE-169. (VENDOR SPEND) Refer to Response to EOE-051, Att.1. For each of the following vendor examples, explain what specific O&M services were performed by the vendor during 2025. As part of the response, please provide supporting invoices or other documentation.

a. Alden Systems Inc: $482,379.08;
b. Creative Surveying LLC: $446,773.96;
c. FirstEnergy Service Company: $1,575,775.19

EOE-170. (VENDOR SPEND) Refer to Response to EOE-051, Att.1. For each of the following vendor examples, explain how it was possible for both the 2025 O&M and 2025 storm costs to have reported the same amounts. As part of the response, please provide supporting invoices or other documentation.

a. Atlantic Power Constructors, LLC: $433,860.66;
b. Jalbear Brothers Inc.: $578,124.65;
c. Quanta Infrastructure Solutions Group: $323,805.30.