STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	**:**	**DOCKET NO. 26-05-10**
	:	**October 28, 2026**

CONNECTICUT INDUSTRIAL ENERGY CONSUMERS
SECOND SET OF INTERROGATORIES

The Connecticut Industrial Energy Consumers ("CIEC") requests responses from The Office of Consumer Counsel ("OCC") to the following interrogatories in the above-captioned proceeding by **November 11, 2026**. If there are any objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (*e.g.*, documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct, and complete copies of the original document.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and

accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody, or control of the responding party's directors, officers, employees, representatives, or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

DEFINITIONS

A. "Whited Direct Testimony" means the Pre-filed Direct Testimony of Melissa Whited on behalf of OCC in this proceeding dated October 21, 2026. Page and line citations to Whited Direct Testimony refer to the printed page numbers and line numbers of that testimony.

B. "CL&P" or "Company" means The Connecticut Light and Power Company d/b/a Eversource Energy.

C. "AMI" means advanced metering infrastructure. "MDS" means the Company's minimum distribution system study. "EDR" means the Company's proposed Economic Development Rate Rider. "NCP" means non-coincident peak. "TOU" means time-of-use.

D. "22-08-08 Decision" means the Authority's August 25, 2023 Decision in Docket No. 22-08-08. "24-10-04 Decision" means the Authority's October 28, 2025 Decision in Docket No. 24-10-04.

E. "NARUC Manual" means the National Association of Regulatory Utility Commissioners Electric Utility Cost Allocation Manual (January 1992).

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production requests you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody, or control, or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify, or correct your responses to each of these interrogatories and production throughout until a final decision is adopted by the Authority in this Docket.

INTERROGATORIES

The following interrogatories are directed to OCC Witness Melissa Whited:

CIEC-2. Please refer to Whited Direct Testimony at page 11, lines 3-15, and page 12, line 1 (Table 1) and line 2.

Please provide the following regarding Table 1:

a. All workpapers supporting Table 1 in Excel format with formulas intact, to the extent not otherwise provided in response to CIEC-1.

b. The source note to Table 1 cites "Exhibit CLP-AMI-3, Figure 7." Please identify the specific page and figure of Exhibit CLP-AMI-3 from which each net present value ("NPV") benefit amount in Table 1 was taken.

c. Explain the basis for splitting the $163.80 million VVO benefit into $106.2 million energy-related and $57.6 million demand-related, and provide the supporting calculation.

d. For each benefit category in Table 1, explain specifically why the classification assigned reflects the cause of the cost of AMI meters, as opposed to the type of benefit Ms. Whited believes AMI provides.

CIEC-3. Please refer to Whited Direct Testimony at page 4, lines 11-15; page 11, lines 4-9; and page 12, line 1 (Table 1).

a. Please confirm that Ms. Whited's proposed 38% customer / 47% demand / 15% energy classification would apply only to AMI meter plant (FERC Account 370). If it would apply to any other AMI-related costs (*e.g.*, the customer information system, meter data management system, communications network or VVO enablement), identify each such cost and the classification proposed for it.

b. Please state whether the benefits in Table 1 are, in Ms. Whited's understanding, attributable to the AMI meters alone or to the Company's AMI program as a whole (including the customer information system, meter

data management system, communications network and VVO enablement). If the latter, explain why they are an appropriate basis for classifying the cost of the meters alone.

CIEC-4. Please refer to Whited Direct Testimony at page 11, lines 6-9, and page 12, line 1 (Table 1, rows "VVO" and "Asset Optimization").

a. Please state and explain in detail whether the VVO and Asset Optimization benefits shown in Table 1 would be realized if the Company installed AMI meters but did not make the VVO enablement investment included in its AMI cost estimates.

b. To the extent those benefits depend on the VVO enablement investment, please explain why they are an appropriate basis for classifying the cost of AMI meters.

CIEC-5. Please refer to Whited Direct Testimony at page 11, lines 8-9, and page 12, line 1 (Table 1, row "Improved Restoration – Significant Storms").

a. Please explain specifically how the cost of storm restoration, or the value of reduced customer outage time during significant storms, varies with class peak demand, and provide any study or analysis supporting the classification of this $162.4 million benefit as demand-related.

b. Please identify any regulatory decision or cost allocation authority that classifies storm restoration costs as demand-related.

CIEC-6. Please refer to Whited Direct Testimony at page 4, lines 13-15, and page 11, lines 4-5 and 12-15.

a. Please explain how a classification proportional to projected benefits reflects the causes of the costs being classified, particularly where the projected benefits of the AMI program are less than its projected costs (see Exhibit CLP-AMI-3 at 17-18, Figure 8).

b. If the Company's benefit estimates are revised in a future proceeding, or actual benefits differ from those projected, would Ms. Whited's proposed classification of AMI meter costs change accordingly? Please explain the answer in detail.

CIEC-7. Please refer to Whited Direct Testimony at page 9, lines 13-18.

a. Please identify each AMI capability referenced at lines 14-16 that Ms. Whited contends is not currently available to customers served under Rate 39 and Rate 57 through their existing metering.

b. Has Ms. Whited reviewed the number, type or cost of the meters currently serving Rate 39 and Rate 57 customers? If so, provide the information reviewed.

CIEC-8. Please refer to Whited Direct Testimony at page 4, lines 11-15, and page 12, lines 3-4.

a. Please identify the allocation factors Ms. Whited would use to allocate the demand-related and energy-related portions of AMI meter costs to rate classes.

b. Please provide, by rate class (including Rate 39 and Rate 57), the allocation of an illustrative $1 million AMI meter revenue requirement under (i) Ms. Whited's proposed classification and (ii) the weighted meter cost allocator used for Account 370 in the Company's ACOSS (Exhibit CLP-ACOS-2 at 16-20). Provide workpapers for the foregoing in Excel format.

c. If Ms. Whited has not performed such an analysis, please explain why not.

CIEC-9. Please refer to Whited Direct Testimony at page 12, line 5, through page 13, line 5.

a. Please confirm that in the 24-10-04 Decision (at 197-198), OCC recommended that AMI costs be classified according to benefits in the customer, demand and energy categories, and the Authority "affirm[ed] the Company's proposed classification of AMI meters as 100% customer-related, which is consistent with cost causation principles."

b. Please explain why Ms. Whited's testimony does not address that determination.

c. Please identify each fact specific to CL&P that Ms. Whited contends warrants a different classification of AMI meter costs than the Authority approved for UI.

d. Other than the Maryland decision cited at page 12, line 6 through page 13, line 5, please identify every regulatory decision of which Ms. Whited is aware that adopted or rejected a benefits-based classification of AMI meter costs, and provide a copy of each.

e. Please identify each proceeding in which Ms. Whited or Synapse Energy Economics, Inc. has recommended a benefits-based classification of AMI or smart meter costs, and state the outcome in each.

CIEC-10. Please refer to Whited Direct Testimony at page 4, lines 7-10, and page 18, lines 8-21.

a. Please confirm that in the 24-10-04 Decision (at 198), in response to OCC's recommendation of the basic customer method, the Authority stated that "it is not clear that the basic customer method is a superior alternative" and found that "[t]he MSS approach is a just and reasonable approach to cost classification."

b. Please confirm that in the 22-08-08 Decision (at 227-228), the Authority found the minimum system methodology "generally acceptable" and accepted its use.

c. Please explain why Ms. Whited's testimony cites the 24-10-04 Decision for the load-carrying capacity adjustment (page 17, lines 11-15) but does not address the Authority's rejection of the basic customer method in that same decision.

d. Please identify any facts, data or analysis specific to CL&P, or developed since the 24-10-04 Decision, that Ms. Whited contends warrant a different result in this proceeding.

CIEC-11. Please refer to Whited Direct Testimony at page 15, lines 6-16.

a. Please confirm that the "additional distribution system poles and wires" that a new rural customer "may require" in order "to extend service to the customer's residence" (lines 12-14) would be required even if that customer's demand were negligible, and are therefore not caused by that customer's peak demand.

b. Under the basic customer method Ms. Whited recommends, would the cost of those poles and wires be classified as demand-related and allocated to rate classes based on class NCP demand? If so, explain how that result is consistent with cost causation.

c. Please confirm that the costs of the poles and wires required to connect customers vary with the number and geographic dispersion of customers rather than with their peak demand.

CIEC-12. Please refer to Whited Direct Testimony at page 15, line 17, through page 16, line 2.

a. Please confirm that, as described at page 15, lines 19-20, Professor Bonbright argued that the costs of the minimum system "should be excluded from demand-related costs."

b. Please explain how Ms. Whited's recommendation to classify all costs in FERC Accounts 364-368 as demand-related (page 19, lines 8-9) is consistent with that view.

c. Please provide a copy of pages 347-348 of Principles of Public Utility Rates (1961) as relied upon.

CIEC-13. Please refer to Whited Direct Testimony at page 4, lines 3-6; page 16, lines 3-11; and page 18, lines 15-21.

a. Please provide a copy of any Ontario Energy Board decision or order (as distinct from the Board Staff Discussion Paper cited in footnote 27) that approved the density-based classification method Ms. Whited describes.

b. Please identify each U.S. state regulatory commission of which Ms. Whited is aware that has adopted a customer density-based classification of distribution plant, and provide a copy of each relevant decision.

c. Please confirm that, under the density-based approach Ms. Whited describes, a portion of distribution plant in each density category would still be classified as customer-related.

d. Please identify the data the Company would need to develop the proposed density-based approach and whether, to Ms. Whited's knowledge, the Company currently maintains those data.

CIEC-14. Please refer to Whited Direct Testimony at page 16, line 12, through page 17, line 15, and page 19, lines 1-7.

a. Please identify the specific per-customer load-carrying capacity values, by equipment type (*e.g.*, primary and secondary poles, overhead and underground conductors, line transformers), that Ms. Whited recommends be used for CL&P, and provide all supporting workpapers.

b. Please confirm that in the 24-10-04 Decision (at 197-199), the Authority adopted load-carrying capacity values based on UI's own minimum-sized equipment rather than the generic per-customer values of 0.4 kW and 1.5 kW that OCC presented, and found that omitting classes whose demands can "generally" be met by the minimum system "is too imprecise to be a reasonable approach."

c. Does Ms. Whited agree that any load-carrying capacity adjustment for CL&P should be calculated from the load-carrying capability of the specific minimum-sized facilities in the Company's MDS study? If not, explain why not.

d. Please explain how the proposed adjustment would be applied to classes, such as Rate 39, that take service at primary voltage and are not allocated the costs of secondary facilities.

e. Please provide any quantification Ms. Whited has performed of the effect of her proposed adjustment on class rates of return, including for Rate 39 and Rate 57.

CIEC-15. Please refer to Whited Direct Testimony at page 19, lines 8-13, and page 20, line 1 (Table 3).

a. Please identify the data request response or other document that is the source of Table 3 and provide a copy, including any Excel workpapers.

b. Please provide, by rate class, the change in revenue requirement at equalized rates of return that would result from replacing the MDS method with the basic customer method.

CIEC-16. Please refer to Whited Direct Testimony at page 4, lines 16-22, and page 21, line 11, through page 22, line 10.

a. Please confirm that Ms. Whited proposes that the equipment-level allocation study be filed alongside, and not in place of, the Company's conventional class cost of service study in its next rate case, and that she is not recommending that the Authority adopt the equipment-level method in this proceeding.

b. Please confirm that, under Ms. Whited's proposal, the loads of customers taking service at primary or transmission voltage would be excluded from the allocation of facilities at lower voltage levels that they do not use, consistent with the NARUC Manual at 97.

c. Please confirm that Ms. Whited would preserve the Company's current exclusion of customers served from customer-owned transformers from the allocation of Account 368 line transformer costs (Exhibit CLP-ACOS-1 at 6, lines 8-10).

d. Please confirm that in the 24-10-04 Decision (at 200-201), UI reported that its alternative substation and feeder allocators were "very similar" to its NCP and 1CP allocators, and that the Authority retained NCP allocators, adjusted for load-carrying capacity, for poles, conductors and line transformers.

e. Please provide any estimate Ms. Whited has made of the cost to the Company of retaining, aggregating and analyzing hourly AMI data at the substation, feeder and line transformer level.

f. Please explain how the proposed study would allocate the costs of substations or feeders dedicated to serving a single customer.

CIEC-17. Please refer to Whited Direct Testimony at page 5, line 6, and page 39, lines 18-20.

a. Please provide the precise tariff definition of "data center loads" that Ms. Whited proposes for the EDR exclusion.

b. Please state whether the proposed exclusion would include a minimum size threshold and, if so, what that threshold would be.

c. Please state whether the exclusion would apply to a manufacturing facility with significant on-site computing, automation or process control load, and explain how such a facility would be distinguished from a data center.

d. Please state whether the exclusion would apply to incremental load resulting from the electrification of industrial processes, such as process heating.

e. Please explain how the exclusion would apply to a facility that combines data center and non-data center operations.

CIEC-18. Please refer to Whited Direct Testimony at page 38, lines 3-19, and page 39, lines 3-10.

a. Please confirm that the EDR approved for UI in the 22-08-08 Decision (at 252) is "available to all C&I customers, without any cap on participation," subject only to an exception for C&I customers directly participating in local commerce, and does not exclude data center loads.

b. Please identify any generation or transmission cost that Ms. Whited contends would be borne by other customers as a result of a discount applied only to the distribution charges of a data center customer.

c. Please provide any Connecticut-specific evidence that the siting decisions of data center developers are insensitive to the level of distribution rates.

CIEC-19. Please refer to Whited Direct Testimony at page 40, lines 7-22.

a. Please identify each transmission or supply cost that Ms. Whited contends incremental EDR load would impose on other customers and that would not be recovered from the EDR customer through its undiscounted transmission charges and its supply arrangements.

b. Please confirm that new load whose revenue exceeds its marginal cost to serve places downward pressure on rates for other customers regardless of whether that load is concentrated in off-peak hours.

c. Please provide any quantification Ms. Whited has performed of the transmission or supply cost impacts referenced at lines 10-16.

CIEC-20. Please refer to Whited Direct Testimony at page 41, lines 15-20, and page 5, lines 7-9.

a. Please state whether the proposed TOU requirement would apply only to the EDR customer's incremental load or to the customer's entire facility, including its pre-existing load.

b. Please state whether the EDR would be unavailable to customers until the proposed industrial TOU rates are filed and approved by the Authority.

c. Please state whether Ms. Whited proposes that the new industrial TOU rates be mandatory, optional or unavailable for Rate 57 and Rate 58 customers that do not participate in the EDR.

d. Please identify each jurisdiction of which Ms. Whited is aware that requires customers to take service under a TOU rate as a condition of eligibility for an economic development rate, and provide the relevant tariff or decision.

e. Please confirm that the EDR approved for UI in the 22-08-08 Decision does not require participants to take service under a TOU rate.

f. Please provide any analysis Ms. Whited has performed of the load profiles, load factors or load flexibility of Rate 57 and Rate 58 customers.

CIEC-21. Please refer to Whited Direct Testimony at page 41, lines 3-14.

a. Please provide all studies, data or other support for the statement at lines 9-11 that an eight-hour on-peak period "can make it difficult for customers to manage around."

b. Please identify the on-peak period Ms. Whited would recommend for the industrial TOU rates she proposes, and provide all supporting analysis.

c. Please identify any analysis Ms. Whited has performed of the bill impacts of her proposed industrial TOU rates on Rate 57 and Rate 58 customers.

d. The reference at line 12 to "Section V.29C" appears to be a typographical error. Please identify the section of Whited Direct Testimony intended.

CIEC-22. Please refer to Whited Direct Testimony at page 5, lines 10-13; page 43, lines 13-15; and page 44, lines 7-12.

a. Whited Direct Testimony describes the proposed discount cap as "50 percent of the net present value of incremental revenues" (page 5, lines 12-13), as "50 percent of the total incremental distribution revenue from the incremental load" (page 43, lines 13-14, describing the UI EDR) and as "50 percent of the net present value of the incremental distribution revenues, accounting for the cost of connecting the customer and any other electric infrastructure investments made to serve the incremental load" (page 44, lines 10-12). Please reconcile these descriptions and state precisely how the cap would be calculated.

b. Please confirm that Ms. Whited intends the cap and associated hurdle rate analysis to replicate those the Authority approved for UI in the 22-08-08

Decision (at 249-251). If not, identify each difference and explain why it is warranted.

c. Please state whether "the cost of connecting the customer and any other electric infrastructure investments" would include costs that the EDR customer pays directly to the Company through a contribution in aid of construction or otherwise under the Company's new business policies (CL&P Response to OCC-932(a)).

d. Please provide a numerical example illustrating the calculation of the proposed cap.