Date Filed: October 27, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, and Ronald S. Smith
Request from: ALLCO

Question:

(Follow-up to ALLCO-065 through ALLCO-073 — the facts underlying the Withheld Reports.) Without regard to any privilege claimed for the reports themselves, state: (a) the date on which the Legal Department requested or directed each audit, and the date on which the engagement memorandum for each was issued; (b) whether an audit of the ISO-New England load-settlement process or of the procurement organization appeared in the Internal Audit Department's approved annual audit plan for 2025 or 2026 before the Legal Department's direction, and if so when it was added; (c) whether the workpapers for each audit are maintained in AutoAudit in the same manner as the workpapers for the audits listed in the Company's response to OCC-307; (d) each corrective action, process change, resettlement request, refund, or accounting adjustment that the Company, Eversource Energy Service Company, or any affiliate has made as a result of either audit, with the date and amount; (e) whether any error in the reporting or settlement of load with ISO New England was identified for Connecticut, Massachusetts, or New Hampshire, the period affected, and the dollar amount of any over- or under-settlement; and (f) whether any amount so identified is reflected in the Test Year, Test Year Pro Forma, or Rate Year cost of service, with the schedule and workpaper reference.

Response:

Please refer to the Company's responses to ALLCO-065[i], ALLCO-066[ii], ALLCO-067[iii], ALLCO-068[iv], ALLCO-069[v], ALLCO-070[vi], ALLCO-071[vii], ALLCO-072[viii] and ALLCO-073[ix], which constituted discovery Set 7 for ALLCO, and provided sufficient information to be responsive to Allco's inquiry.

Prior Referenced Responses:

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[i] ALLCO-065 Question:

For each of the Withheld Reports, identify each person who requested, directed, authorized, approved, or was consulted concerning the initiation, scope, or terms of the engagement — stating for each person his or her name, title, and employer entity (specifying whether the person is employed by the Company, by Eversource Energy Service Company, or by another affiliate, and whether the person is an attorney) — state the date and form (written or oral) of each such request or direction, and identify and produce each engagement memorandum, scoping document, work plan, annual audit-plan entry, or other written directive or communication concerning the initiation or scope of either engagement; for any such document withheld on a claim of privilege, provide a log entry stating its date, author, all recipients, and the basis of the claim.

ALLCO-065 Response:

Load Settlement:
This report was prepared by Internal Audit at the request and under the direction of the Company's Legal Department ("Legal") in view of pending and threatened litigation (the "Privileged Load Settlement Report"). The request from Legal (via a meeting discussion) was made to Internal Audit on April 25, 2025. The engagement memo, with the scope and objectives approved by Legal, was issued on May 19, 2025. The engagement memo states that the work was performed "under Legal's directions". The Privileged Load Settlement Report dated January 7, 2026, relates to the process the Company's affiliates use to report and settle energy loads in the ISO-New England load settlement system. The report was issued by R. S. Smith, Vice President-Internal Audit & Security and M. M. Carlson, Manager, to the Eversource Legal Department on January 7, 2026.

Procurement:
Legal requested that Internal Audit conduct a privileged and confidential assessment and generate a report for Legal (the "Privileged Procurement Report"). The Privileged Procurement Report was finalized on June 4, 2026, and is labeled as "CONFIDENTIAL ATTORNEY-CLIENT PRIVILEGED." The Privileged Procurement Report is addressed from R. S. Smith, Vice President-Internal Audit & Security to Vincent Pace, Assistant General Counsel in the Eversource Legal Department.

[ii] ALLCO-066 Question:

For each of the Withheld Reports, identify every person who has received, been shown, been briefed on, or been given access to the report or any draft, portion, excerpt, summary, or description of its findings — whether in written form, by electronic access, by presentation, or orally — stating for each person: name; title; employer entity; whether the person is an attorney; the date and format of the disclosure; the purpose of the disclosure; and the specific job function that is contended to have required that person's access to the report's contents. The response should specifically address any disclosure to: (a) officers or directors of the Company, of Eversource Energy, or of any affiliate; (b) any board of directors or board committee, including any audit committee; (c) personnel of the Internal Audit Department; (d) personnel of the procurement organization or of any business unit responsible for load settlement; (e) outside counsel; (f) any outside consultant, advisor, or auditor, including FTI Consulting, Overland Consulting, and the Company's financial statement auditor; (g) personnel of any affiliate; and (h) any governmental agency or any party to any other proceeding.

ALLCO-066 Response:

Load Settlement:
The draft Privileged Load Settlement Report was issued on 12/8/2025 to the attorney from the Eversource Legal Department ("Legal") advising the Company; and three employees from the Eversource Energy Supply Department with responsibility for load settlement processes. The final Privileged Load Settlement Report was issued on 1/7/2026 to three attorneys from Legal responsible for advising and representing the Company, and the following business representatives with a need to know: three employees from the Eversource Electric Supply Department; six Eversource Executive Vice Presidents; two employees from Eversource Customer Operations; three employees from Eversource IT; the VP of Accounting; and two individuals from the Company's external auditing firm. The report was then issued on 1/12/2026 to Eversource's Chairman, President and Chief Executive Officer, along with his assistant and the Executive Vice Presidents of the department. 1+3= 4, Final report 3+3+6+2+3+1+2= 20.

Procurement:
The draft Privileged Procurement Report was issued on 5/13/2026 to two attorneys from Legal responsible for advising the Company and the Procurement Department regarding the matters contained in the draft; and four employees in the Eversource Procurement Department. The final Privileged Procurement Report dated 6/4/2026 was issued to four attorneys from Legal responsible for advising the Company and the Procurement Department regarding the matters contained in the draft; as well as four employees in the Eversource Procurement Department.

The Company's response to ALLCO-067i identifies the electronic database(s) in which the two above-described privileged reports are stored.

[iii] ALLCO-067 Question:

For each of the Withheld Reports, identify each information system, repository, drive, or platform in which the report or any draft of it is or has been stored; describe the access controls applied; state the number of persons who hold or have held access credentials to each such location; and state whether any access log exists and, if so, identify its custodian.

ALLCO-067 Response:

The Eversource Internal Audit Department ("Internal Audit") houses reports in a departmental shared drive, an online SharePoint site and the departmental work paper system (AutoAudit). This data response identifies where the privileged reports are stored electronically and how many Eversource employees have access to those electronic folders.

AutoAudit is accessible only to the Internal Audit staff (currently 19 Eversource employees) as approved by the Internal Audit Department Vice President. Auto Audit access is administered within the Internal Audit department to verify that access remains with those that have a need to access it.

The Internal Audit departmental shared drive and the online SharePoint site are accessible only to the Internal Audit staff, as well as the Internal Audit Department's Executive Assistant (for a current total of 20 Eversource employees), as approved by the Internal Audit Departmental Vice President. In order for another Eversource employee to access the SharePoint site or departmental shared drive, approval must be requested from, and granted by, a member of Internal Audit.

Eversource's Executive Risk Management ("ERM") group also houses reports in their departmental shared drive, which is currently accessible only by the four employees within the group. ERM also utilizes a SharePoint site in collaboration with Internal Audit. This SharePoint site is currently accessible to the four employees in the ERM group and employees in the Internal Audit group. ERM manually maintains and verifies that access to the SharePoint location is granted only to those who require it. The ERM departmental shared drives are maintained administratively by IT to ensure that access remains with those who require it and are approved to receive access by ERM.

Data response ALLCO-066i identifies the Eversource employees and attorneys that the Internal Audit worked with in preparing the privileged reports as well as those employees who were sent a copy of the privileged reports.

[iv] ALLCO-068 Question:

For each of the Withheld Reports: (a) identify the specific litigation, proceeding, or claim that the Company contends was anticipated at the time the report was commissioned, and state when and how the Company contends that anticipation arose; (b) state whether the report, its findings, or information derived from it has been used, referenced,

or relied upon in connection with this Application or any testimony or exhibit in this docket, the proceeding in Docket No. 25-01-03, FERC Docket No. EL26-5-000, or any other proceeding; and (c) state whether the report, its findings, or information derived from it has been used in connection with any remediation, process improvement, or "responsiveness" initiative — including the modifications and improvements to the load settlement system, processes, and controls, and the improvements to procurement practices and preparedness, described in the Company's Objection to Motion No. 40 — and identify each such use.

ALLCO-068 Response:

Load Settlement:

(a) This report was prepared by Internal Audit at the request and under the direction of the Company's Legal Department attorneys in view of potential litigation (the "Privileged Load Settlement Report"). The Privileged Load Settlement Report dated January 7, 2026, relates to the process the Company's affiliates use to report and settle energy loads in the ISO-New England ("ISO-NE") load settlement system. This report was issued by R. S. Smith, Vice President-Internal Audit & Security and M. M. Carlson, Manager, to the Eversource Legal Department on January 7, 2026.

Pending litigation in question includes the FERC proceeding in Complaint of BP Energy Retail Company LLC v. ISO New England Inc., Eversource Energy and NSTAR Electric Company, dated Oct. 14, 2025, FERC Docket No. EL26-5-000 ("BPERC Complaint"). In this FERC proceeding, BP Energy Retail Company LLC ("BPERC"), a competitive energy supplier in Massachusetts, filed the referenced complaint at FERC pursuant to Sections 206 and 306 of the Federal Power Act, Rule 206 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure, and to the extent, applicable, Section 6.3.6 of Exhibit ID of the ISO-NE Billing Policy.

The BPERC Complaint was filed against ISO-NE, Eversource Energy and NSTAR Electric Company, seeking relief from certain invoices issued by ISO-NE based on load it claims was incorrectly assigned to it by Eversource Energy and NSTAR Electric Company solely in Massachusetts through the load settlement process caused by Omni software in or around June of 2024. The Privileged Load Settlement Report has been used in connection with the above pending and potential litigation.

(b) Please refer to the Company's response to subpart (a).

(c) Please refer to the Company's response to subpart (a).

Procurement:

(a) In CL&P's 2025 Rate Adjustment Mechanism ("RAM") proceeding in Docket No. 25-01- 03, PURA concluded that CL&P's procurement practices created a risk of potential adverse findings in a future docket, such as the next RAM docket or rate case, stating in relevant part that "the Authority will continue to review the Company's implementation of procurement practices . . . . The violations documented herein and any failure by the Company to improve its procurement practices and compliance therewith may be indicative of inefficient and imprudent management." (Docket No. 25-03-01, August 13, 2025, Decision at 32)(emphasis added.) Subsequently, in Docket No. 24-12-01, PURA's November 5, 2025, final decision imposed a return on equity penalty on CL&P's affiliate, Yankee Gas, based on PURA's finding that the Eversource Procurement Department's "recordkeeping gaps impair the transparency of the procurement process, and in turn weaken corporate accountability and the Authority's ability to conduct effective oversight. For the foregoing reasons, the Authority concludes that an ROE reduction is warranted for imprudent record management and procurement practices." (Docket No. 24-12-01, November 5, 2025, Decision at 17.) PURA's decision therefore admonished the Company that its explanations about procurement practices did

"not release the Company from its responsibility to maintain adequate [procurement] records. The difference between the ultimate contract award and the RFP documentation should be clear, unambiguous, and maintained in a verifiable manner." (Id.)

In light of these regulatory developments, CL&P and its legal counsel reasonably expected that procurement practices would be the subject of further litigation before PURA in the contested 2026 RAM proceeding in Docket No. 26-01-03 and the contested rate case in this docket. An Eversource Attorney therefore asked Internal Audit to undertake, at his direction, a privileged and confidential assessment of procurement practices and documentation and generate a report for the Legal Department so that Legal could provide advice and recommendations regarding alignment with regulatory expectations (the "Privileged Procurement Report"). The Privileged Procurement Report was finalized on June 4, 2026, and is labeled as "CONFIDENTIAL ATTORNEY-CLIENT PRIVILEGED." The Privileged Procurement Report is addressed from Ronald Smith, Vice President of Eversource Internal Audit & Security to Vincent Pace, Assistant General Counsel in the Eversource Legal Department who was responsible for providing legal advice and representation to the company in connection with the aforementioned regulatory proceedings.

(b) Please refer to the Company's response to subpart (a).

(c) Please refer to the Company's response to subpart (a).

[v] ALLCO-069 Question:

Identify every internal audit, review, or assessment of (a) the procurement organization or the Company's procurement practices, and (b) the load settlement process or the reporting and settlement of energy loads, performed in whole or in part during 2018 through 2026 stating for each: its title; date; author(s); addressee(s); whether any claim of privilege or work-product protection has been asserted over it; and whether it was produced in response to OCC-307, EOE-057, or any other discovery request in this docket. For each such audit over which privilege is asserted, state every fact that the Company contends distinguishes it from the audits of the same subject matter that the Company produced without any claim of privilege.

ALLCO-069 Response:

(a) **Procurement**

Report Issue Date	Audit Report #	Audit Report Title	Existing Record Citation, if Applicable
9/20/2019	19-39	Procurement - Investment Recovery Follow-up Audit	Provided in EOE-057, Attachment 2 CONFIDENTIAL, REDACTED FOR RELEVANCE
3/04/2020	20-19	Procurement PO & Contract Audit	Provided in EOE-057, Attachment 3 CONFIDENTIAL
3/11/2021	21-15	3rd Party Vendor Management Audit	
1/31/2023	23-11	Procurement – Sole Sourcing Audit	Provided in EOE-057, Attachment 4 CONFIDENTIAL

8/06/2025	25-27	Procurement Compliance Audit	Cited in OCC-307[i] and produced in EOE-057, Attachment 6 CONFIDENTIAL, AND REDACTED FOR RELEVANCE
1/08/2026	26-06	Supplier Relationship Management Audit	Produced in EOE-057, Attachment 7 CONFIDENTIAL

(b) **Load Settlement**

Report Issue Date	**Audit Report #**	**Audit Report Title**	**Existing Record Citation, if Applicable**
6/23/2020	20-25	Metering and Load Management Review	See footnote (a) below
5/12/2023	23-18	Load Settlement Process Audit	See footnote (a) below

Fn. (a) This report was not provided in OCC-307 because that interrogatory requested information from the period 2024 to present. This report was not provided in response to EOE-057 because that interrogatory was limited to the procurement function.

The June 4, 2026, Privileged Procurement Report was listed in the Company's response to EOE- 057ii and OCC-307. The Company explained the actual report was not provided because it was protected by the attorney-client privilege and work product doctrine.

The January 7, 2026, Privileged Load Settlement Report was listed in the Company's response to OCC-307. The Company explained the actual report could not be provided because it was protected by the attorney-client privilege and work product doctrine.

[vi] ALLCO-070 Question:

For each of the Withheld Reports, identify and produce every pre-existing document, record, data set, system extract, policy, procedure, contract, purchase order, invoice, prior audit report, or other material that the Internal Audit Department collected, reviewed, considered, or relied upon in performing the assessment. A pre-existing business record does not become privileged by being gathered by auditors or transmitted to counsel; for any item nonetheless withheld, provide a log entry stating its date, author, custodian, and the basis of the claim.

ALLCO-070 Response:

Load Settlement Privileged Review
To perform the privileged review, the following was obtained from management responsible for the processes and assessed on a sample basis by Internal Audit:

- Policies and procedures
- Reports, and supporting data, that support the load settlement process
- Access privileges to key data that supports the load settlement process
- Documentation to support ISO billings and payments

Procurement
To perform the privileged review, Internal Audit reviewed a sample of contracts and supporting

documentation for those contracts.

[vii] ALLCO-071 Question:

For each of the Withheld Reports, identify: (a) each member of the Internal Audit Department or other person who performed work on the engagement, stating name, title, and role; and (b) each person interviewed or consulted in the course of the engagement, stating name, title, employer entity, the date(s) of the interview or consultation, and the subject matter addressed.

ALLCO-071 Response:

Work on the Privileged Load Settlement Report was performed by one member of the Eversource Internal Audit Department reporting to the Audit Manager under the direction of the Legal department. Over the course of the engagement, discussions were held with two attorneys in the Eversource Legal department; eight individuals from the Eversource Energy Supply department; four individuals from the Eversource IT department; and one individual from the Eversource Regulatory department.

Work on the Privileged Procurement Report was performed by two members of the Eversource Internal Audit department reporting to the Audit Manager under the direction of the Legal department. Over the course of the engagement, discussions were held with two individuals from the Eversource Legal department and two individuals from the Eversource Procurement department.

[viii] ALLCO-072 Question:

Separately from any legal advice, state the facts ascertained in each assessment. For the Load Settlement Report: describe the load settlement process as it existed during the period assessed, including the systems used; the data flows from metering through submission to ISO-New England; the entities whose load the Company reports and settles; each category of error, exception, or control deficiency identified; and any resettlement, correction, or restatement history reviewed, with amounts. For the Procurement Report: identify the procurement functions, practices, and categories of transactions reviewed; the standards or criteria against which they were assessed; and each factual finding concerning documentation, recordkeeping, competitive bidding, or compliance. If the Company contends that any responsive fact is itself privileged, identify the subject matter of the withheld fact and state the basis for the contention.

ALLCO-072 Response:

Load Settlement
"Load settlement" is the FERC jurisdictional process that involves calculating hourly system loads (energy used) assuming generation quantities1 and tie-line data and allocating that load to the energy suppliers based on metering and customer billing data. The data is then submitted to Independent System Operator New England (ISO-NE). The process is heavily dependent on data received from Eversource billing and meter systems. For an explanation for how load reducers affect load settlement and ISO-NE reported hourly loads, refer to ALLCO-095i.

During the period assessed, the Load Settlement Department (LS) utilized a load settlement application system, which is still used today, to accept multiple system interfaces that feed data from the Eversource billing systems, meter databases, and historical ISO-NE provided data. These interfaces route any metering data into staging tables and then finally into the load settlement application. The application is configured to send an email notification to IT (Information Technology) support and LS when there is an issue with the data import process. Once resolved, LS performs and verifies any system calculations and performs a review of any missing metering data. Once completed, LS then exports the data and sends the results to ISO-NE and relevant stakeholders.

During the period assessed, LS performed a monthly scrub process to compare the load settlement application entries with the billing systems of record. This is a catchall process that captures any differences between the systems for key fields, such as rates assigned, suppliers, and status that occurred during the month.

The focus of the work performed by Internal Audit is described in the response to ALLCO-070ii.

Procurement:
CL&P and its legal counsel reasonably expected that procurement practices would be the subject of further litigation before PURA, in the contested 2026 RAM proceeding in Docket No. 26-01- 03 and the contested rate case in this proceeding. Regarding the portion of this interrogatory that asks the Company to "identify the procurement functions, practices, and categories of transactions reviewed" to prepare the Privileged Procurement Report – and which also asks the Company to identify "the standards or criteria against which they were assessed" – an Eversource attorney asked Internal Audit to undertake a privileged and confidential assessment of the alignment of procurement practices with regulatory expectations and generate a report for the Legal Department.

[ix] ALLCO-073 Question:

Identify every change to the procurement organization's practices, documentation, or controls, and every modification or improvement to the load settlement system, processes, or controls, that has been adopted, implemented, or planned since January 1, 2026 — including those made "in connection with" either of the Withheld Reports — stating for each: the date; a description of the change; the person(s) responsible; and the documents reflecting it, and produce the non-privileged documents so identified. Operational changes made to systems and practices are facts, whatever prompted them.

ALLCO-073 Response:

The Load Settlement Department (LS) at Eversource pursues a continuous improvement process where LS regularly reviews its policies and procedures as well as IT systems that it uses. Since January 1, 2026, LS has implemented additional weekly and monthly meetings to review all workstreams LS is involved in to ensure that resources are efficiently allocated and all team members are aware of all the current and upcoming workstreams. Additionally, LS has added new reviews associated with RBAs and criteria thresholds related to controls of preliminary versus resettlement data. None of these process improvements were in connection with, or as a result of, either of the Withheld Reports.

The Procurement Department manages a complex and enterprise-wide operation that similarly engages in initiatives for continuous assessment, improvement and innovation, with regular evaluation of its policies, procedures, and controls. For example, Procurement has recently updated the Procurement Policy and Procurement Manual to better delineate the categories and activities within and outside Procurement's scope. Procurement is also in the early stages of evaluating other potential future enhancements. However, none of these updates were made in connection with, or as a result of, either of the Withheld Reports.