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**
	:	**SEPTEMBER 10, 2026**

OBJECTION OF ALLCO FINANCE LIMITED TO THE COMPANY'S SECOND MOTION FOR EXTENSION OF TIME CONCERNING ALLCO SET ONE

I. INTRODUCTION AND SUMMARY

Allco Finance Limited ("Allco") objects to the September 9, 2026 motion of The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P" or the "Company") for a second extension of time to respond to three of Allco's Set One interrogatories — ALLCO-003, ALLCO-006, and ALLCO-009—from September 14 to September 21, 2026. These interrogatories were served on August 20 and originally due September 4. The Company has already received one extension, over Allco's objection, on the identical ground it offers again now: the need to "coordinate with the Company's litigation counsel in the federal court lawsuit to determine the extent to which CL&P can respond." The motion's own footnote concedes this is a second bite at the same apple. Seventeen days after the original deadline is enough. The motion should be denied; in the alternative, any extension should be conditioned as set forth in Section IV.

II. THE SOLE GROUND OFFERED IS NOT A GROUND FOR DELAY.

The motion pleads no volume, no workload, and no logistical difficulty as to these three interrogatories. Its sole ground is that they "seek information directly pertaining to claims being adjudicated in ALLCO's Complaint" in federal court, and that the Company must therefore continue consulting its litigation counsel "to determine the extent to which CL&P can respond." That is not a basis for an extension; it is a preview of a refusal. There is no federal-litigation privilege. The pendency of parallel litigation does not diminish a party's obligation to respond to discovery in a regulatory proceeding, and information does not become less discoverable in a rate case because it also may also bear on claims pending elsewhere. The three interrogatories concern the Company's percentage overhead charges to interconnecting customers, its refund practices,

and its administration of the interconnection queue — subjects presented by the Company's own Application and cost-of-service exhibits and squarely within the scope of Allco's intervention. Their relevance to this proceeding is independent of any federal claim, and the Authority's record should not be thinned because the same facts may matter in two forums.

Indeed, the motion concedes the point that matters: the requested information "directly pertain[s]" to the claims Allco is litigating. A responding party does not earn delay by admitting that the requests hit their mark — the concession heightens the obligation to answer. And the "coordination" rationale answers itself. If the Company intends to object on September 21, it needs no extension to say so now; if it intends to answer, vetting by defense counsel in a separate lawsuit is not a cognizable step in preparing a regulatory response. Either way, the extension serves litigation positioning, not response preparation.

III. THE PATTERN, THE TIMING, AND THE PREJUDICE.

This is the second extension sought on the same interrogatories on the same ground, moving the response date from September 4 to September 14 and now to September 21 — while the Company simultaneously represents that it is answering the other ten extended Set One interrogatories on time. The carve-out is surgical: the three interrogatories singled out for further delay are those going to the core of the overhead-charge, refund, and queue issues. The Company also filed this motion only three business days before the current deadline — the minimum its cited Notice of Proceeding contemplates — compressing the window for objection and ruling alike.

The motion's assertion that "no party in this docket will be prejudiced" is incorrect. Intervenor pre-filed testimony is due October 21, 2026; the Authority's audit sessions run October 13-15; and the evidentiary hearings begin February 1, 2027. The responses to ALLCO-003, ALLCO-006, and ALLCO-009 feed directly into Allco's testimony on overhead charges, refunds, and queue administration, and each Set One response cycle has already generated necessary follow-up discovery, which itself requires time to serve and mature before testimony is written. Every week of delay on the three central interrogatories is subtracted from Allco's testimony preparation — an asymmetry entirely of the Company's making.

IV. IN THE ALTERNATIVE, ANY EXTENSION SHOULD BE CONDITIONED

If the Authority nonetheless grants the extension, Allco respectfully requests that the grant be expressly conditioned as follows: (1) the Company shall serve complete, substantive responses to ALLCO-003, ALLCO-006, and ALLCO-009 no later than September 21, 2026, without objections, reservations, or partial responses premised on the pendency of the federal litigation or on "coordination" with litigation counsel; (2) any claim of privilege shall be asserted in conformity with the Authority's July 10, 2026 Procedural Order — with "more than conclusory language, generalized allegations or mere arguments of counsel," Procedural Order at 2, quoting *New Haven v. Freedom of Information Commission*, 205 Conn. 767, 776 (1988) — supported by a document-by-document identification; (3) no further extensions of time shall be granted for these interrogatories; and (4) any motion to compel arising from deficient responses shall be heard on an expedited schedule, given the October 21 testimony deadline.

V. CONCLUSION

The Authority should deny the Company's second motion for extension of time or, in the alternative, grant it only upon the conditions stated in Section IV.

ALLCO FINANCE LIMITED

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CERTIFICATION

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

/s/ Thomas Melone
Thomas Melone