Date Filed: October 06, 2026

Witness: Warren R. Boutin
Request from: ALLCO

Question:

Provide, in native (Excel) format, a schedule of every final accounting or cost reconciliation performed for any interconnecting customer from 2017 through the present, showing for each: an anonymized project identifier; the customer category (certificated qualifying facility, other distributed generation, municipal, or other); the in-service or completion year; the construction cost; the percentage overhead or CIAC rate applied at billing; the overhead dollars billed; the actual overhead, project management and administration, or equivalent dollars and percentage determined in the final accounting; the computed refund or additional amount due; the date computed; the date paid; and the amount outstanding. This schedule supplements the refund schedule requested in Q-ALLCO-108, by adding the billed-percentage and actual-percentage columns for each reconciled project.

Response:

CL&P objects to this request on the ground that it is an improper effort by ALLCO to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.

Without waiving said objection, the final accountings are performed outside of PowerClerk. Accordingly, the information requested does not exist within PowerClerk and cannot be produced.