Date Filed: November 09, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Connecticut Industrial Energy Consumers**

**Question:**

In its responses to OCC-459, OCC-929, OCC-930, and OCC-931, the Panel provided additional information regarding how the EDR in its direct testimony should be implemented. Explain in detail why the Panel did not include this information in its direct testimony.

**Response:**

The Company cannot anticipate all aspects of information that other parties may find of interest when preparing its rate application. The whole process of the rate proceeding is to collaborate with other parties to evaluate an investigate the Company's proposals and that Company sees the discovery process as a critical phase that helps to develop the areas of interest for various parties and intervenors.

In addition, please refer to the Company's prefiled testimony, Exhibit CLP-RATES-1, where the Company has provided its proposed EDR rider and discussed the various aspects of its EDR proposal. In that testimony the Company explained more detailed and implementation-related aspects of its proposal such as qualifying criteria, enrollment and service agreement requirements are subject to further development. For example, the Company stated the following: "As filed the EDR is preliminary and subject to further amendment as the specific functional aspects of the rider are developed (e.g., qualification or form and applicability of pricing discounts)." (Exhibit CLP-RATES-1, page 24, at 7-9). The Company also stated: "The Company requests though this proceeding for PURA to help facilitate[e] further development of qualifying criteria for its proposed EDR." (Exhibit CLP-RATES-1, page 26, at 5-7).