**STATE OF CONNECTICUT**

**PUBLIC UTILITIES REGULATORY AUTHORITY**

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| **APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES** | **:** | **DOCKET NO. 26-05-10** |
| | **:** | **October 29, 2026** |

**CONNECTICUT INDUSTRIAL ENERGY CONSUMERS**
**NINTH SET OF INTERROGATORIES**

The Connecticut Industrial Energy Consumers ("CIEC") requests responses from The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P," or "Eversource") to the following interrogatories in the above-captioned proceeding by **November 12, 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. Citations to the Company's testimony refer to the printed page numbers and printed line numbers of that testimony. Citations to the Company's exhibits refer to the printed exhibit page numbers.

B. "ACOS Direct Testimony" means the Direct Testimony of Amparo Nieto, Exhibit CLP-ACOS-1. "MCOS Direct Testimony" means the Direct Testimony of Amparo Nieto, Exhibit CLP-MCOS-1. "Rates Panel Testimony" means the Direct Testimony of Edward A. Davis and Kimberly R. Parsons, Exhibit CLP-RATES-1. "AMI Panel Testimony" means the Direct Testimony of Jared Lawrence and Douglas Horton, Exhibit CLP-AMI-1.

C. "AMI" means advanced metering infrastructure. "BCA" means the AMI benefit-cost analysis in Exhibit CLP-AMI-3. "MDS" means the Company's minimum distribution system study. "EDR" means the Company's proposed Economic Development Rate Rider. "RDM" means the Company's Revenue Decoupling Mechanism. "TAC" means the Company's Transmission Adjustment Clause. "NCP" means non-coincident peak. "TOU" means time-of-use. "ISO-NE" means ISO New England Inc.

D. "Rate HP" means the residential heat pump rate proposed by Conservation Law Foundation and Sierra Club Witness Juan-Pablo Velez in this proceeding.

## 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

CIEC-38. Please refer to the AMI Panel Testimony at page 15, lines 12-21.

a. Please provide the number of meters the Company expects to replace with AMI meters, by rate class (including Rate 39, Rate 57 and Rate 58).

b. Please provide the number of Rate 39, Rate 57 and Rate 58 customers whose existing meters record interval demand or energy data, and identify the type of meter installed for those customers.

c. Please state whether the meters of Rate 39, Rate 57 and Rate 58 customers that already record interval data will be replaced with AMI meters under the AMI Implementation Plan. If so, explain why replacement is necessary for those customers.

d. Please provide the average installed cost per meter, by rate class, of (i) the existing meters and (ii) the AMI meters the Company plans to install.

CIEC-39. Please refer to the AMI Panel Testimony at page 19, lines 1-6, and Exhibit CLP-AMI-3 at pages 16-17 (Figure 6).

a. Figure 6 shows $309.2 million of six-year capital for "Meters," consisting of $302.4 million for Meters and $6.8 million of Undepreciated Meter Balance. Please separate the $302.4 million into (i) meter equipment and (ii) meter installation labor and other costs, and identify the amount the Company expects to record in FERC Account 370.

b. For each cost category shown in Figure 6, please identify the FERC account or accounts in which the Company expects to record the capital investment.

c. Please identify the VVO Enablement facilities (*e.g.*, substation and line equipment, software) included in the $97.3 million of six-year VVO Enablement capital shown in Figure 6, and state whether the Company proposes to recover those costs through the PBMRP as AMI costs or through another mechanism, and how it proposes to classify and allocate those costs to rate classes.

CIEC-40. Please refer to the AMI Panel Testimony at page 20, lines 9-21.

a. Please confirm that, as stated at lines 9-11, the Company must be able to accurately and timely bill customers for service, and metering infrastructure is necessary to that end.

b. Please confirm that, as stated at lines 12-15, the Company expects to migrate to AMI as its existing AMR meters reach the end of their useful lives, regardless of the BCA results.

c. Please explain the statement at lines 18-20 that "optionality in taking advantage of many AMI benefits will be within the customer's control," and identify the AMI benefits in Exhibit CLP-AMI-3 to which that statement applies.

d. When AMI meter costs are reflected in base distribution rates, does the Company intend to continue classifying AMI meter costs as customer-related, consistent with its treatment of meter costs in the ACOS Direct Testimony at page 4, lines 5-7? If not, explain why not.

CIEC-41. Please refer to Exhibit CLP-AMI-3 at pages 17-18 (Figure 7) and pages 65-67.

a. Please separate the $162.4 million NPV "Improved Restoration – Significant Storms" benefit into (i) avoided Company storm restoration expense and (ii) the value of reduced customer outage time estimated with the interruption cost estimate calculator.

b. For the benefit quantified in part (a)(i), please explain how storm restoration costs are classified and allocated to rate classes in the Company's ACOSS or recovered through the Company's storm cost recovery mechanisms.

c. Please state whether the Company has quantified any of the benefits in Figure 7 by rate class. If so, provide the quantification, including for Rate 39, Rate 57 and Rate 58.

d. Please identify any benefit in Figure 7 that the Company expects to be realized by Rate 39, Rate 57 or Rate 58 customers, and explain the basis for that expectation.

CIEC-42. Please refer to the ACOS Direct Testimony at page 6, lines 11-25.

a. Please provide the meter weighting factors and average installed meter cost by rate class used to develop the meter plant allocation factor, together with the supporting workpapers in Excel format with formulas intact.

b. Please state whether, and how, the Company would update those weighting factors to reflect the cost of AMI meters by rate class once AMI meters are deployed.

CIEC-43. Please refer to the ACOS Direct Testimony at page 6, lines 1-10.

a. Please explain how the demand allocators for primary and secondary distribution facilities exclude the loads of customers that take service at primary or transmission voltage from the allocation of facilities at lower voltage levels.

b. Please provide the class NCP demands used for each demand allocator, by voltage level.

c. Please identify the number of Rate 39 customers served at each delivery voltage and the number of Rate 57 customers served at each delivery voltage.

CIEC-44. Please refer to the ACOS Direct Testimony at page 7, lines 11-25, and page 8, lines 1-4.

a. Please provide, by rate class, the change in revenue requirement at equalized rates of return that would result from classifying all costs in FERC Accounts 364 through 368 as demand-related (*i.e.*, the "basic customer method"), relative to the Company's MDS method, together with supporting workpapers in Excel format.

b. Please provide any other analysis the Company has performed in this proceeding of the effect of the basic customer method on class rates of return.

CIEC-45. Please refer to the Rates Panel Testimony at page 30, lines 6-12.

a. Please identify each non-distribution component of the rates applicable to large commercial and industrial customers that the Company considers time-varying and that, as stated at lines 6-8, "provide additional incentive and opportunity for customer benefit through efficient utilization of electric service."

b. Please state the Company's position on a requirement that EDR participants take service under a new TOU rate with time-differentiated distribution, transmission and generation charges that has not yet been designed or approved, and explain the basis for that position.

c. Please state whether the Company's billing system can currently bill an EDR participant's incremental load under a different rate structure than the participant's pre-existing load.

CIEC-46 Please refer to the Rates Panel Testimony at page 29, lines 1-12, and page 31, lines 5-6, and Exhibit CLP-RATES-3 at pages 38-40.

a. Please identify any transmission or supply cost associated with an EDR participant's incremental load that the Company expects would be borne by customers other than the EDR participant, and explain why.

b. Please confirm that, under the Terms and Conditions for Electric Suppliers at pages 38-40 of Exhibit CLP-RATES-3, the hourly load of an EDR participant, including its coincident peak capacity values, would be assigned to the participant's electric supplier (including Standard Service or Last Resort Service) for ISO-NE settlement.

c. Please state whether interconnection, system upgrade or make-ready costs paid directly by an EDR participant (including through a contribution in aid of construction) would be included as a cost of serving the incremental load in determining whether revenues exceed incremental cost of service or in determining the discount cap.

CIEC-47. Please refer to the Rates Panel Testimony at page 24, lines 18-22, and page 25, lines 1-8.

a. Please state whether the Company has a definition of "data center" or "large-scale computational load" that it would use to determine whether a customer's load is data center load. If so, provide it.

b. Please identify the number of inquiries the Company has received since January 1, 2024 regarding new or expanded load from (i) data centers and (ii) manufacturing or other industrial customers, by size range.

CIEC-48. Please refer to the Rates Panel Testimony at page 22, lines 14-21.

a. Please confirm that any shortfall in actual distribution revenue relative to the authorized revenue target, regardless of its cause, would be reconciled through the RDM.

b. Please confirm that, as proposed, the RDM rate would be a single per-kWh rate applied to all rate classes, including Rate 39, Rate 57 and Rate 58.

c. For each of the Company's last three RDM reconciliation filings, please provide the total RDM amount and the amount recovered from or credited to each rate class, including Rate 39, Rate 57 and Rate 58.

d. Please explain how a reduction in distribution revenue resulting from a heat pump rate, such as Rate 6 or Rate HP, would be recovered between rate cases, and identify the share that would be recovered from non-residential rate classes.

CIEC-49. Please refer to Exhibit CLP-RATES-3 at pages 186-187 (Transmission Adjustment Clause).

a. Please describe how the Company allocates its transmission revenue requirement among rate classes in setting retail Transmission Service Rates, and provide the allocation factors used for the rates proposed in this proceeding.

b. Please explain the basis for the difference between the proposed Transmission Service Rates for Rate 5 and Rate 1.

c. Please explain how any under-collection of transmission revenue from a particular rate schedule is recovered through the TAC reconciliation, and state whether it is recovered from all rate classes.

d. Please explain how an under-collection of transmission revenue resulting from a 75% reduction in the winter (November through March) Transmission Service Rate for heat pump customers, as proposed for Rate HP, would be recovered.

CIEC-50. Please refer to Exhibit CLP-RATES-3 at page 186 (Transmission Adjustment Clause), which refers to "the transmission costs of acquiring such services."

a. Please identify the billing determinants ISO-NE uses to assess Regional Network Service and Local Network Service charges to the Company, including whether those charges are based on the Company's network load at the time of the monthly peak.

b. Please provide the Company's monthly network load used to determine Regional Network Service charges for each month from January 2023 through the most recent month available.

c. Please provide the Company's estimate of the change in its annual Regional Network Service charges that would result from a 1 MW increase in its network load at the time of the monthly peak in each of the months of November through March.

CIEC-51. Please refer to the MCOS Direct Testimony at page 6, lines 9-14; page 18, lines 4-13; and page 19, lines 1-4.

a. Please provide any analysis or forecast the Company has of when its system, or individual bulk or distribution substations, would become winter peaking as a result of heat pump adoption, including for years after 2031.

b. Please identify the bulk substations that experienced an annual peak load in December or January in any of the years 2022 through 2025.

c. Please provide the heat pump adoption assumptions used in the MCOS study's analysis of load shapes through 2031.

d. Please explain the statement at page 19, lines 3-4 that "[i]n the longer-term, additional electrification will shift more cost responsibility to the winter evening hours," including the time frame the Company expects.

CIEC-52. Please refer to the Rates Panel Testimony at page 31, lines 14-24; page 32, lines 1-19; and page 36, lines 1-9.

a. Please provide the Company's estimate of the number of Rate 6 participants and the resulting annual reduction in distribution revenue relative to Rate 1 for each year from 2027 through 2031, with supporting workpapers.

b. Please explain how any reduction in distribution revenue resulting from Rate 6 would be recovered, including whether any portion would be recovered from non-residential rate classes through the RDM or otherwise.

c. Please provide the number of the Company's residential customers known to have installed heat pumps before January 1, 2026 (*e.g.*, through Energize CT incentive records), and the Company's estimate of their annual winter usage.

d. Please estimate the annual revenue reduction that would result if winter usage from end uses other than heat pumps, such as electric vehicle charging, received the Rate 6 Block 2 rate as described at page 36, lines 3-7.