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 AUGUST 1, 2026

MOTION OF ALLCO FINANCE LIMITED FOR PARTICIPANT/INTERVENOR STATUS

Pursuant to Conn. Gen. Stat. § 4-177a(b) and the Public Utilities Regulatory Authority's ("PURA" or the "Authority") Rules of Practice, Regs. Conn. State Agencies § 16-1-1 et seq., Allco Finance Limited ("Allco") respectfully moves for intervenor/participant status in the above-captioned docket, and in support states as follows:

I. THE PROCEEDING

1. This docket concerns the application of The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") to amend its rate schedules. By letter dated May 20, 2026, Eversource noticed its intent to file a rate amendment application seeking an increase in its annual revenue requirement of approximately $503 million — an average increase of approximately 11% across all customer classes, and approximately 13% for typical residential customers — with new rates proposed to take effect in July 2027. Eversource has represented that approximately half of the requested increase reflects previously incurred expenses from capital investments made since its last rate case, and the balance reflects increased operation and maintenance costs.

2. No evidentiary hearings have yet been held in this docket. This motion is therefore timely under Conn. Gen. Stat. § 4-177a, and its grant will not delay or disrupt the procedural schedule.

3. Allco's corporate mission is to combat climate change, ensure a full accounting of the economic and health burden on ratepayers from current energy policy, enforce laws that benefit developers of solar energy developers on a broad scale and fighting the devastating environmental impacts from burning fossil fuels, including without limitation the adverse effects that continued use of fossil-fuel generation will have on humans and endangered species.

4. Allco also has a substantial interest as a ratepayer and as the developer and owner of solar photovoltaic projects in Connecticut. These proceedings may have a substantial impact

on rates, interconnection costs and thus on the development and operation of solar electric generation in Connecticut. The Application directly impacts issues pertinent to Allco, including its costs as an interconnection customer.

5. Marginal cost of service studies filed in the Application show that the cost of new customer connections (calculated per kW of design demand, net of customer contributions) is derived directly from these updated marginal facilities costs, meaning updated connection charges for new customers—including those requiring new service extensions—are being recalculated as part of this proceeding. Exhibit CLP-MCOS-1 at 13 and Exhibit CLP-MCOS-2 at 7. The Application also proposes establishment of a Shared Hosting for Advancement of Renewable Energy ("SHARE") program, which contemplates a cost-sharing methodology specifically for substations with long distributed energy resource ("DER") queues. The Application specifically proposes an average interconnection fee based on a preliminary analysis. Exhibit CLP-TSP-3 at Page 144.

6. Among other things, the Application identifies significant Eversource system capacity and investment issues. Specifically, Eversource's five-year System Performance and Investment Plan, filed as part of this rate case, notes that of the roughly 1,882 MW of distributed generation installed in Connecticut since 2000, the majority of projects installed since 2015 have been small rooftop solar, which typically progress to an interconnection agreement quickly, while larger solar projects (more common since 2017) usually require a system impact study. The System Performance and Investment Plan identifies that over 550 MW of large solar projects are stuck in interconnection queues across Eversource's Connecticut substations, and that roughly 260 MW of in-queue DERs at eight specific substations cannot interconnect without substation transformer upgrades or new transformers. Exhibit CLP-TSP-2 at Page 43. The Application states that "significant substation upgrades will be needed to integrate large-scale DER and support state clean energy goals." Exhibit CLP-TSP-3 at 29.

7. Among other things, the Application proposes new Eversource programs and initiatives relevant to Allco. The Application proposes implementation of DER forecasting capabilities in Connecticut (Exhibit CLP-ELP-1 at Page 72) and a Performance-Based Rate structure, whereby Eversource would be incentivized to facilitate DER integration and penalized if it fails to achieve its stated targets (Exhibit CLP-ELP-1 at Page 109 and Exhibit CLP-CUSTOMER-1 at 34). To facilitate these programs.

8. Allco has direct, concrete, and ongoing interests in the reasonableness of the costs Eversource seeks to recover in this proceeding as a ratepayer, and developer and operator of solar energy facilities in Connecticut. Among other things: (a) Eversource's own December 2024 Final Accounting Reports provided to Allco for certain existing Allco interconnections admit that Eversource collected percentage-based "overhead" (CIAC) charges of 9.97% to 13% from Allco's qualifying facilities while its actual documented administrative overhead ranged from 1.47% to 2.58% — an overcharge of approximately 4.9 times actual cost, in violation of the incremental-cost ceiling of 18 C.F.R. § 292.101(b)(7); (b) Eversource admits owing, and has not paid, $257,260.19 in interconnection-cost refunds to Allco; and (c) Eversource retains approximately $1.7 million of Allco's deposits, performance assurance, and refunds across multiple Eversource-administered programs. On information and belief, the general and administrative expense allocations embedded in Eversource's "overhead" charges — and the costs of Eversource's conduct toward independent QF developers more generally — are reflected in the revenue requirement, operation and maintenance expenses, and capital cost recovery that Eversource asks ratepayers to bear in this docket.

9. Allco brings a perspective no other participant offers: that of an independent renewable energy developer and operator with a decade of direct, documented experience with the interconnection cost practices, distributed-energy-resources administration, program administration, and cost-allocation practices whose prudence and reasonableness are squarely at issue in a rate case. Allco's participation will assist the Authority in examining, among other things: (a) whether Eversource's claimed operation and maintenance and administrative and general expenses include costs that FERC's regulations require to be borne by Eversource rather than recovered from ratepayers or overcharged to QFs; (b) whether amounts Eversource admits owing but has not refunded to counterparties are properly reflected in its cost of service; (c) the prudence of expenses associated with Eversource's administration of its interconnection queue and various renewable energy programs and power purchase contracts; and (d) the reasonableness of executive compensation and other general and administrative expense allocations included in the revenue requirement.

10. Allco intends to fully participate in this proceeding, including through issuance of interrogatories, filing written comments, participating in any technical meetings or hearings

(including submission of testimony, filings and any other proceedings related thereto), as well as filing briefs and reply briefs as necessary.

11. Importantly, Allco's participation will assist the Authority in illuminating and resolving the issues in this proceeding.

Conclusion

Allco's interests are not adequately represented by existing parties. Allco's participation in these matters will aid the Authority in its consideration of the issues herein and will not impair the orderly conduct of the proceedings.

Copies of all pleadings and other materials should be provided via electronic mail to the following:

Thomas Melone
President
Juris No. 438879
Allco Finance Limited
777 West Putnam Avenue, Suite 300
Greenwich, CT 06830
Thomas.Melone@AllcoUS.com

WHEREFORE, Allco Finance Limited respectfully request that the Authority grant its petition for Participant/intervenor status in these proceedings.

I hereby certify service of this filing upon all parties or intervenors of record in this proceeding.

Dated: August 1, 2026

Respectfully submitted,

/s/Thomas Melone
Thomas Melone
Juris No. 438879
Chief Executive Officer
Allco Finance Limited
777 West Putnam Avenue, Suite 300
Greenwich, CT 06830
Phone: (212) 681-1120
Email: Thomas.Melone@AllcoUS.com