STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**SEPTEMBER 2, 2026**

THE OFFICE OF CONSUMER COUNSEL'S
THIRTEENTH SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **September 16, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. 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 documents.

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.

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 request 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 in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-544 through OCC-558 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-544. Referring to Exhibit CLP-STORM-1 at 41. The Company states that it "does not apply a specific formula" to correlate forecast damage locations to crew quantity. Please explain the method used to translate expected damage into crew requirements, including the role of professional judgment.

OCC-545. Referring to Exhibit CLP-STORM-1 at 61-62, 75. The Company concludes that its decision-making was reasonable under the circumstances and that the costs were necessary. Please identify any alternative resource plans considered and explain how cost, restoration time, and risk informed the plan selected.

OCC-546. For each storm event in the proposal, please provide every resource plan prepared before or during the event, each significant revision, and the contemporaneous approval of any change to the event level or commitment of external crews. Identify the date, time, decision-maker, resources affected, and reason for each decision.

OCC-547. Referring to Exhibit CLP-STORM-1 at 28. The Company states that outage-model accuracy depends on the quality and confidence of the weather forecasts used as inputs. For each event, provide each weather and outage forecast, actual results, forecast errors, and vendor or model accuracy evaluations.

OCC-548. Referring to Exhibit CLP-STORM-1 at 29-30. The Company states that event levels may be modified as conditions and actual impacts become better understood. For events with impacts below forecast, please explain how the event level and resource plan were reassessed as conditions developed.

OCC-549. Referring to Exhibit CLP-STORM-1 at 28-31. The Company identifies UCONN and DTN/SIA outage-prediction models and describes those models as reference tools.

a) Please provide each time-stamped weather, outage and damage forecast used, actual results, forecast errors together with the corresponding model inputs, outputs, confidence ranges and revisions.
b) Please show how each forecasting model performed against actual storm results, including whether it predicted too much or too little damage. Identify any changes staff made to the forecasts, who approved them, and how uncertainty affected the number of extra crews secured.
c) For each storm event, provide model accuracy evaluations.

OCC-550. Refer to Exhibit CLP-STORM-1 at 12, 52. The Company states that its ERP uses feedback and performance measurement for continuous improvement and that it evaluates results after ERP execution. Please identify the metrics and targets used after each event to evaluate forecast accuracy, restoration performance, resource utilization, and cost.

OCC-551. For each storm event, please provide the lessons-learned action tracker and show how completed actions changed later event plans or procedures and how their effectiveness was verified.

OCC-552. For each storm event, please provide the after-action reports and each post-event comparison of forecasts, resources, restoration performance and cost, including the management review and resulting corrective actions.

OCC-553. For each storm event, please provide productive, travel, staging, standby, idle and demobilization hours, including the cost of hours not associated with a work assignment.

OCC-554. For each storm event, please provide the release and demobilization criteria and quantify cancellation charges, minimum guarantees, travel, standby, unused lodging and other non-productive costs.

OCC-555. Please provide any analysis of the restoration-time benefit associated with additional external crews and any lower-crew alternative considered.

OCC-556. Referring to Exhibit CLP-STORM-1 at 41. The Company states that it secures the closest available resources to minimize travel time and reduce cost. Please provide comparable rates for contractors, affiliates and mutual-aid crews, and explain how proximity and cost informed resource selection.

OCC-557. Referring to Exhibit CLP-STORM-1 at 63, 74-75. The Company reports compliance with Typical Restoration Duration and describes the OMS cost comparison as a "rough comparison." Please identify the metrics used to evaluate restoration cost effectiveness and provide the data supporting the OMS cost-per-event comparison.

OCC-558. (STANDARD SERVICE)

a. May a residential customer contracted with an electric supplier return to standard service on the same day as calling the Company and requesting to return to standard service? If no, how long until the switch occurs? Please cite all applicable Authority or legal guidance, and provide all Company written policies and procedures.
b. May a business/commercial customer contracted with an electric supplier return to standard service on the same day as calling the Company and requesting to return to standard service? If no, how long until the switch occurs? Please cite all applicable Authority or legal guidance, and provide all Company written policies and procedures.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

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CERTIFICATE OF SERVICE

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

Dated at New Britain, Connecticut this 2nd day of September, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court