Date Filed: October 06, 2026

Witness: Jessica B. Cain and Daniel M. Traynor
Request from: ALLCO

Question:

For each case listed in Attachment 1 hereto, state, in a single native-format (Excel) schedule keyed to the docket number: (a) the amount claimed by the Company in the action; (b) the amount of any final judgment entered against the defendant; (c) the amount actually collected from the defendant in respect of the amount claimed; (d) whether the case is completed or ongoing, and, if completed, the manner and date of disposition; and (e) the legal fees paid by the Company in connection with the case, to the Law Offices of Alexander G. Snyder LLC or any other firm. If the Company contends that any case listed in Attachment 1 was not handled by that firm on the Company's behalf, identify each such case and state the basis for that contention.

Response:

Due to the COVID-19 pandemic, all legal collections were suspended, and the Company did not refer any *new* customers starting in March 2020 until November 2024 when PURA authorized legal collections to restart[1]. Since the Company received that directive, the Company has restarted the residential legal collections process and have gradually referred accounts to a third-party legal collection's attorney. While legal collections have restarted, PURA ruled to restrict[2] wage garnishments to residential customers with a household income at or above 75% SMI.

The Company uses the Law Offices of Alexander G. Snyder ("AGS") to use available legal remedies to collect on significantly delinquent residential and non-residential accounts. As indicated in the Company's to OCC-309[i], the fees paid to AGS were $426,806 (2021); $376,048 (2022); $643,913 (2023); $882,201 (2024); and $1,632,968 (2025), totaling $3,961,936. When legal collections resumed, balances were higher due to the 4½ year collections pandemic moratorium, and corresponding commission payments to legally referred accounts increased. Total legal collections increased throughout the years as shown in the table below:

[1] PURA's November 6, 2024 Decision in Docket No. 24-5-01, Order No. 3 allows the post-pandemic resumption of legal collections activities in accordance with Section II.E.2, Legal Collections and Wage Garnishment.

[2] Docket No. 22-03-16 decision with restrictions.

Year	Payments Collected Through Legal Collections ($M)
2021	$3.4
2022	$2.4
2023	$3.7
2024	$4.7
2025	$8.2

a. Please refer to the referenced cases and court case lookup for the amounts claimed in each action at https://www.jud.ct.gov/jud2.htm.

b. Please refer to the response in subpart (a).

c. Please refer to the response in subpart (a), for judgments that have been satisfied.

d. Please refer to the response in subpart (a).

e. Please refer to the Company's response to OCC-309 for the legal fees paid by year.

Any dollars that are recovered for residential hardship customers offset the hardship uncollectible expenses in the System Benefits Charge. All other recovered dollars on write-offs helps offset costs for all customers

Prior Referenced Response:

[i] OCC-309 Question:

Legal Expense. Please itemize the amount of outside legal expense (direct and allocated) (excluding rate case expense, by vendor, for each of the years 2021, 2022, 2023, 2024, 2025, and the amount included in the rate year.

OCC-309 Response:

Please refer to OCC-309 Attachment 1, which lists the Company's outside legal expenses by vendor for each of the years 2021, 2022, 2023, 2024, 2025 (Test Year). The Company's outside legal expenses for the Rate Year totaled $5.388 million, which were calculated using the GDP-PI escalation factor against the Test Year Pro-Forma, as provided in Exhibit CLP-REVREQ-2 Schedule C-3.20.

Date Filed: October 06, 2026

Witness: Jessica B. Cain and Daniel M. Traynor
Request from: ALLCO

Question:

With respect to the fees identified in the response to OCC-309, for the Law Offices of Alexander G. Snyder LLC: (a) reconcile the aggregate per-case fees provided in response to the preceding interrogatory to the annual amounts stated in OCC-309, identifying any fees not attributable to a case listed in Attachment 1 and the matters to which they relate; (b) identify the FERC account(s) in which those fees are recorded and state whether, and in what amount, they are included in the Test Year or Rate Year cost of service in this proceeding, identifying the schedule and line; (c) state whether amounts collected through these actions — including any court-awarded fees, costs, or interest — are credited to ratepayers, and if so where, and if not, why not, including the interaction with the uncollectible-accounts expense recovered in rates; and (d) describe the terms of the firm's engagement (hourly rates, flat fees, contingency, or other), state whether the engagement has ever been competitively procured, and produce the engagement agreement(s).

Response:

Please refer to the Company's response in ALLCO-116[i].

Prior Referenced Response:

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[i] ALLCO-116 Question:

For each case listed in Attachment 1 hereto, state, in a single native-format (Excel) schedule keyed to the docket number: (a) the amount claimed by the Company in the action; (b) the amount of any final judgment entered against the defendant; (c) the amount actually collected from the defendant in respect of the amount claimed; (d) whether the case is completed or ongoing, and, if completed, the manner and date of disposition; and (e) the legal fees paid by the Company in connection with the case, to the Law Offices of Alexander G. Snyder LLC or any other firm. If the Company contends that any case listed in Attachment 1 was not handled by that firm on the Company's behalf, identify each such case and state the basis for that contention.

ALLCO-116 Response:

Due to the COVID-19 pandemic, all legal collections were suspended, and the Company did not refer any *new* customers starting in March 2020 until November 2024 when PURA authorized legal collections to restart[i]. Since the Company received that directive, the Company has restarted the residential legal collections process and have gradually referred accounts to a third-party legal collection's attorney. While legal collections have restarted, PURA ruled to restrict[i] wage garnishments to residential customers with a household income at or above 75% SMI.

The Company uses the Law Offices of Alexander G. Snyder ("AGS") to use available legal remedies to collect on significantly delinquent residential and non-residential accounts. As indicated in the Company's to OCC-309[i], the fees paid to AGS were $426,806 (2021); $376,048 (2022); $643,913 (2023); $882,201 (2024); and $1,632,968 (2025), totaling $3,961,936. When legal collections resumed, balances were higher due to the 4½ year collections pandemic moratorium, and corresponding commission payments to legally referred accounts increased. Total legal collections increased throughout the years as shown in the table below:

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2024	$4.7
2025	$8.2

a. Please refer to the referenced cases and court case lookup for the amounts claimed in each action at https://www.jud.ct.gov/jud2.htm.

b. See response in subpart (a).

c. See response in subpart (a), for judgments that have been satisfied.

d. See response in subpart (a).

e. Please refer to the Company's response to OCC-309, for the legal fees paid by year.

Any dollars that are recovered for residential hardship customers offset the hardship uncollectible expenses in the System Benefits Charge. All other recovered dollars on write-offs helps offset costs for all customers.

Date Filed: October 06, 2026

Witness: Jessica B. Cain and Daniel M. Traynor
Request from: ALLCO

Question:

For each calendar year 2021 through 2025, state in the aggregate for the litigation described in Attachment 1: the number of new actions commenced; the total amounts claimed; the total judgments obtained; the total amounts actually collected; and the total legal fees paid. State whether the Company has ever analyzed the cost-effectiveness of this collections litigation — comparing fees paid to amounts recovered — and identify and produce each such analysis, or state affirmatively that none exists. Identify, by title, each person who supervises the engagement, approves its invoices, and decides whether to commence or continue individual actions, and explain the drivers of the increase in annual fees from $376,048 in 2022 to $1,632,968 in 2025, including any change in the volume of referrals, scope of work, or rates.

Response:

Please refer to the Company's response in ALLCO-116[i].

Prior Referenced Response:

[i] ALLCO-116 Question:

For each case listed in Attachment 1 hereto, state, in a single native-format (Excel) schedule keyed to the docket number: (a) the amount claimed by the Company in the action; (b) the amount of any final judgment entered against the defendant; (c) the amount actually collected from the defendant in respect of the amount claimed; (d) whether the case is completed or ongoing, and, if completed, the manner and date of disposition; and (e) the legal fees paid by the Company in connection with the case, to the Law Offices of Alexander G. Snyder LLC or any other firm. If the Company contends that any case listed in Attachment 1 was not handled by that firm on the Company's behalf, identify each such case and state the basis for that contention.

ALLCO-116 Response:

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moratorium, and corresponding commission payments to legally referred accounts increased. Total legal collections increased throughout the years as shown in the table below:

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c. See response in subpart (a), for judgments that have been satisfied.

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e. Please refer to the Company's response to OCC-309 for the legal fees paid by year.

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