Date Filed: October 07, 2026

Witness: David L. Gladey, Lavelle A. Freeman, Steven Lamontagne, Steven C. Osuch, Edward A. Davis and Amparo Nieto
Request from: Office of Consumer Counsel

Question:

(ACOSS) Refer to Exhibit CLP-ACOS-1, page 6, lines 6:7, regarding the use of class NCPs.

a. Please explain whether a class's NCP accurately reflects the class's contribution to the capacity requirements for substations and feeders, which may peak at different times than the class.

b. Please explain whether the Company considered using more detailed class load data for each feeder and substation to more accurately allocate costs associated with each class's load during the peak hours for each feeder or substation. If yes, please explain why the Company did not use this method. If no, please explain why not.

c. For each of the Company's substations and feeders, please provide an Excel workbook with the 8760 load data for each of the past three years, as well as the feeder or substation name/number. If the requested data are not available, please provide the data that most closely match that requested (e.g., the date and time of the equipment's peak demand, as well as the maximum MVA demand for each of the last three years.)

d. Does the Company have the ability to provide class load data for each substation and/or feeder for each of the past three years? If yes, please provide this data in an Excel workbook. If not, please explain what would be required to provide this data.

e. Please provide the system 8760 load data for each class for each of the past three years in an Excel workbook.

Response:

a. Class NCP reflects the load diversity within each class. The class NCP allocator represents the maximum load placed by the class on the grid (e.g., transformer) during a given year, but not necessarily at the time when the asset reaches its maximum load, if said asset serves other classes. Thus, it is distinct from Coincident Peak (CP) allocators, which measure the share of each class load at the time of peak load on the equipment. Class NCP has been used in embedded cost studies as guided by NARUC for the demand-related share of transformer and cables. Class NCP does not accurately reflect each class's load ratio share at the time of the transformer/ feeder coincident peak. Instead, class NCP is intended to be a proxy to allocate cost responsibility of the capacity requirements of the plant. Class NCP only accurately represents class responsibility if the substation / transformer/ lines were

mostly designed dedicated to serve a single class. Given that this is very locational specific for the transformer and local conductors, class NCP was adopted to approximate the relative class responsibility on the cost/required size of the equipment, to introduce class diversity as compared to the individual customers' NCPs. This is because planners will take into account that there is diversity within the class.

b. The Company initially considered using an allocator for the top 50 hours representing highest coincident maximum demand on the distribution system (50 CP) calculated by Ms. Nieto from hourly system loads, for Station plant (Acc. 362) only. This allocator could more accurately allocate growth-related capacity costs driven by each class's load during the peak hours at substations. The Company ultimately decided not to adopt this method out of concerns of the streetlighting classes not receiving a reasonable allocation, of other costs not related to the peak hour, that could misallocate cost particularly for substations peaking in winter, since the top 50 hours occur in the summer months in daylight hours. The ACOS model, Allocator tab includes the 50CP allocator, and a summary comparing the 50CP with the hybrid 50CP/NPC and the class NCP allocator is provided in OCC-861, Attachment 7.

c. Please refer to OCC-861, Attachment 1 CONFIDENTIAL through OCC-861, Attachment 6 CONFIDENTIAL, for the information requested in subpart (c).

   i. OCC-861, Attachment 1 – Feeder Peaks
   ii. OCC-861, Attachment 2 – 2023 Circuit kW
   iii. OCC-861, Attachment 3 – 2024 Circuit kW
   iv. OCC-861, Attachment 4 – 2025 Circuit kW
   v. OCC-861, Attachment 5 – 23-25 SubTx kW
   vi. OCC-861, Attachment 6 – Substation Coincident Peak 23-25

   Please note that the Company does not identify the system peak by utilizing the systems raw 8760 data as peaks identified within this metered data may be transient situations such as planned or unplanned outages, switching, etc. For this reason the Company has also provided the coincident peak data within the data centers contained within these attachments.

d. The Company does not possess nor have the ability to provide this data. In order to obtain this data, each customer of each customer class would require AMI, at a minimum, as customer metered load would need to be synchronized to capture coincident loading on a particular feeder or circuit. With AMI, given the dynamic nature of real-time operations, loads would likely be aggregated based upon the customers' normal configuration which would not necessarily coincide with the real-time 8760 loading data of the feeder and substation level meter data.

e. As identified in the response to subpart (d) of this response, the Company does not possess this data.

Date Filed: October 06, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(RATE 6 – RESIDENTIAL SPACE HEATING RATE) Refer to Exh. CLP-RATES-6, at 2. Please provide all supporting calculations and documentation, in live Excel format with all formulas intact, for the following values:

a. The marginal customer cost of $28.98/customer-month.
b. The marginal facilities cost of $24.51/customer-month. Please identify the FERC accounts included in the calculation of marginal facilities cost.
c. The system peak coincidence factors of 25.6% with space heating and 40.1% without space heating.

Response:

The source of the monthly marginal customer cost of $28.98/customer-month and the monthly marginal facilities cost of $24.51 is the MCOS Model, Exhibit CLP-MCOS-2 (Confidential), summarized in tab T.1. "Comparison to Current Rates", corresponding to Rate 1, as well as in the MCOS-1 Testimony, Table 1, page 17.

The back up for the analysis of local distribution facilities and monthly customer costs is included in the Exhibit CLP MCOS-2, tabs T4-A ("Annual Distribution Facilities"), and T5-A "Annual Customer RES GS", which are fed from the corresponding worksheets in the model, W7 to W25. The input data into the calculation of meter and meters, service and facilities cost by class, which feeds into the marginal cost model were separately provided as part of the Company's response to OCC-365[i], and is provided in response to RRU-033[ii].

The type of assets included in the calculation of the monthly facilities charges involve costs that may be required to interconnect a customer to the main grid, (i.e., line transformers, the local primary conductors, the secondary cables if customer receives secondary service, and poles) and these are recorded in FERC accounts 364, 365, 366, 367 and 368.
System peak coincidence factors.

These factors are derived from load research analyses from Rate 5 and Rate 1, respectively. The general calculation is: Coincidence Factor (CF) = Total Demand at System Peak Hour / Sum of Each Customer's Individual Peak Demands. The calculated CF for each of these rate classes, expressed as a percentage, is as follows:

- Rate 1: CF = (2,600,481 / 6,479,748) * 100 = 40.1%
- Rate 5: CF = (291,886 / 1,141,046) * 100 = 25.6%

The source data for these calculations is provided in the Test Year load research analyses for Rates 1 and 5. Please refer to the Company's response to CIEC-017[iii].

Prior Referenced Response:

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[i] OCC-365 Question

Workpapers. Please provide all workpapers the Company utilized in preparing its schedules, if not previously filed with PURA. Provide the workpapers in electronic format, with all formulas and calculations intact.

OCC-365 Response:

Please refer to the Attachments listed below for the requested workpapers:

- OCC-365, Attachment 1, for workpapers used in the preparation of Exhibit CLP-RATES-2.
- OCC-365, Attachment 2 through OCC-365, Attachment 9, for workpapers used in the preparation of Exhibit CLP-DEPRECIATION-3 and CLP-DEPRECIATION-4.
- OCC-365, Attachment 10, for excel versions of Exhibit CLP-ROE-2 through CLP-ROE-12 with formulas and calculations intact. For all supporting workpapers to Exhibit CLP-ROE-2 through CLP-ROE-12, refer to OCC-365, Attachment 10, through 24.
- OCC-365, Attachments 25, and 26, for the workpapers to Exhibit CLP-ACOS-2.
- OCC-365, Attachment 27, through OCC-365, Attachment 37, for the workpapers to Exhibit CLP-MCOS-2.

[ii] RRU-033 Question:

(ACOS) Application, Ex. CLP-ACOS-1, Dir. Test. Nieto, p. 7. Provide the average installed meter cost for each rate class. Include the underlying calculations, assumptions and supporting documentation in the response.

RRU-003 Response:

The detailed underlying calculations, assumptions and supporting documentation are included in RRU-033, Attachment 1.

[iii] CIEC-017 Question:

Provide all workbooks, in native Excel format with all formulas intact, used to create Exhibit CLP-ACOS-2-CONFIDENTIAL. Include in your response all workbooks used to create the allocators located on tabs "APPENDIX 1.B. ALLOCATOR_INPUT" and "APPENDIX 1A. ALLOCATORS." If the requested workbooks already have been provided in response to an interrogatory, specify the interrogatory that requested those files.

CIEC-017 Response:

The workbooks, in native Excel format, used to create the external allocators in Exhibit CLP-ACOS-2-CONFIDENTIAL, appearing on tabs "APPENDIX 1.B. ALLOCATOR_INPUT" and "APPENDIX 1A. ALLOCATORS", were provided as part of OCC-365, Attachment 25.

In addition, attached to this response is a workbook in Excel format that includes additional load research reports, which provide class NCP and other External allocator data included in APPENDIX 1.B. ALLOCATOR_INPUT. This information is not included in OCC-365, Attachment 25. Please see CIEC-017, Attachment 1. Load data for External allocators of classes not included in the load research data provided in CIEC-017, Attachment 1 (e.g., unmetered class loads for Rates 115, 116 and 117) has been obtained from and is included in the Company's rate design workpapers as part of Exhibit CLP-RATES-2.

Please note, to assist in locating the source workbooks and data for APPENDIX 1.B ALLOCATOR INPUT, and APPENDIX 1.A ALLOCATORS, within OCC-365, Attachment 25, the Company has prepared and included a reference table as part of this response. Please see CIEC-017, Attachment 2.

Date Filed: October 06, 2026

Witness: Edward A. Davis, Justin M. Pelkowski, Gerhard Walker, Kimberly R. Parsons and Amparo Nieto
Request from: Office of Consumer Counsel

Question:

(RATE 6 – RESIDENTIAL SPACE HEATING RATE) Please provide the following data, in native Excel format with all formulas intact, for the most recent 3 consecutive years for which historical data is available and 3 future years for which forecasted data is available:

a. Average hourly system load data by month;
b. Average hourly marginal costs by month;
c. Maximum monthly system peak;
d. 8760 load data for the residential class.

Response:

Please refer to the following attachments for the Company's response to the following subparts;

- Please refer to OCC-863, Attachment 1, for the response to subpart (a)
- Please refer to OCC-863, Attachment 2, for the response to subpart (b)
- Please refer to OCC-863, Attachment 3, for the response to subpart (c)
- Please refer to OCC-863, Attachment 4, for the response to subpart (d)

The hourly system load data and maximum monthly system peak loads were calculated from historical hourly distribution substation loads (last 3 years) across all distribution substations in Eversource's service area. No forecasted hourly system loads are available.

The hourly average marginal costs by month requested in subpart (b) and included in OCC-863, Attachment 2, that reflects the system-wide marginal distribution substation and trunkline feeder cost per kW, assigned to each hour type within the month.

Date Filed: October 06, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(RATE 6 – RESIDENTIAL SPACE HEATING RATE) Refer to the Company's response to CLF-002. Please provide, in live Excel format with all formulas intact, all supporting analysis and documentation for the statement that "conversion to heat pump typically increases the household's total energy bill at current prices." Clarify the electric and gas rate designs the calculations of "current prices" were based on.

Response:

The statement refers to impacts under prevailing, current rates in effect apply for electric or gas service. Conversion and thereby increased electric load without any change in rates will result in an increased energy bill, while the redesign of base rates (prior to the heat pump conversion) and lower rate for incremental load of a heat pump offsets that higher bill.

Date Filed: October 06, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(RATE 6 – RESIDENTIAL SPACE HEATING RATE) Has the Company conducted any analysis on the expected enrollment into Rate 6, and resulting attrition from other residential rates offered?

Response:

The Company reviewed the deployment of heat pump deployments under its rebate program over a 3-year period but did not conduct an analysis and projection of Rate 6 enrollment. Rather, the design of Rate 6 is predicated on incremental load and costs to serve, without a specific level of enrollment. Our primary objective is to make available through this rate proceeding an alternative residential space heating rate for future deployments of air sourced heat pumps. The foundation rates in this design are designed around requirements for residential customers prior to incremental load (i.e., for sales and revenue requirements of Rate 1 as a basis), and distribution rates for incremental load is set on a marginal cost basis.

Regarding "attrition", this design also aligns with the migration of customers from Rate 1 to Rate 6. The portion of load that exists prior to incremental load additions that migrates from Rate 1 to Rate 6 continues to be served on rates redesigned to the same revenue requirement as as Rate 1. Incremental load and any changes to service associated with such addition are addressed in the proposed design such that the rate effect of moving to Rate 6 is minimized by preserving the recovery of cost of service through rates designed for the migrating load. Effectively, fixed costs included in volumetric rates have been moved to the monthly cost, lowering the volumetric rate applicable to the kWh prior to load additions (more efficient, volumetric rates). On average, Incremental load is not affected by the rate redesign, as the recovery of costs from migrating sales is addressed through rate design and the establishment of a usage threshold (i.e., the 700 kWh average monthly usage breakpoint, whereby each month usage up to that point remains on the redesigned volumetric rate set to recover the equivalent revenue of Rate 1).

Date Filed: October 06, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Office of Consumer Counsel

Question:

(RATE 6 – RESIDENTIAL SPACE HEATING RATE) Please explain how Rate 6 would function with the low-income discount rate, specifically explaining if financial hardship customers on Rate 6 would receive the full LIDR discount as well as the incentivized discount incorporated into Rate 6.

Response:

Yes, financial hardship customers on Rate 6 would receive the full applicable LIDR discount, which would be applicable in the same way as a Rate 1, 5 or 7 customer, to all billed amounts including the 2nd tier (so called "incentive" rate) charges, subject to any potential usage limit on eligible charges that may be determined.