Date Filed: September 28, 2026

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

Question:

Refer to Exhibit CLP-AMI-2 at 5, "Time-varying rates rely on interval usage data, advanced billing system functionality, customer access to timely consumption information, and robust customer education and engagement programs. AMI provides the technological foundation necessary to support future time-varying rate offerings, including time-of-use, critical peak pricing, and other demand-responsive rate designs. However, these capabilities cannot be fully, equitably realized until AMI meters have been installed and activated for the majority of customers and the supporting data management, communications, and billing systems have been fully integrated and tested".

a. Please explain why TVR cannot be implemented upon commencement of AMI deployment similar to capabilities including power outage restoration, bulk data sharing, energy efficiency and demand management analytics.
b. Please explain when the Company intends to develop and file proposals to implement time-of-use, critical peak pricing, and other demand-responsive rate designs.

Response:

a. If PURA approves the Company's proposal to leverage the MA technology platforms for CT, the capabilities will exist upon "go-live" of the foundational systems (CIS, MDMS) and the completion of the AMI network, subject to testing for the CT deployment. However, while the technical capabilities will exist at the start of the AMI meter deployment (subject to testing), the Company is proposing a timeline based on the equally important change management and customer education considerations for a successful TVR launch. Accordingly, the Company recommends the convening of an inclusive stakeholder process once AMI meter installation begins so that actual customer interval usage data can be used to evaluate TVR options and reach consensus conclusions on rate design and effective communications. Further, the Company's AMI Implementation Plan includes the development of a Rate Comparison Tool that will help customers evaluate their TVR options based on customized analysis and recommendations, which will be reliable only after they amass sufficient interval usage data after receiving their meters. This will allow customers to fully understand their options and make informed selections of the TVR rate that best meets their individual goals. Not only does the Company's proposed timeline allow for a more positive customer experience based on customized

TVR analyses and recommendations, it also ensures that all customers (who have not opted out off AMI) are eligible to enroll in TVR at the time the broad Marketing, Education and Outreach Plan enters the TVR rollout phase.

b. As noted in OCC-422[i], the Company plans to file an opt-out TVR proposal by October 1, 2027, while additionally presenting the merits of an opt-in approach to TVR given the status of AMI implementation at that time. Additionally, as noted above, the Company recommends the convening of an inclusive stakeholder process once AMI meter installation begins so that actual customer interval usage data can be used to evaluate TVR options and reach consensus conclusions on rate design. Based on this recommended stakeholder process, the Company would then file an additional TVR rate proposal during the AMI meter installation period so that PURA approval would be obtained in time to educate customers and launch the rate(s) approximately one year after completion of AMI meter installation.

Prior Referenced Response:

[i] OCC-422 Question:

Please refer to Exhibit CLP-Rates-1, p. 12, in which the Company states that it developed a time-varying rate (TVR) Outreach, Education, and Engagement plan "in consultation with the OCC."

a. Please confirm that OCC and Eversource only met once, on July 1, 2026, and OCC explained it had not had time to do a complete review of the proposed Outreach, Education, and Engagement Plan.
b. Please confirm that in the meeting on July 1, 2026, OCC explained that Public Act Section 20 requires the Company to file an opt-out TVR proposal no later than October 1, 2027.
c. Please confirm that in the meeting on July 1, 2026, OCC indicated it had concerns about issuing the Outreach, Education, and Engagement Plan for an opt-in only TVR if the law requires the Company to file an opt-out TVR only months after the current rate case's decision.
d. Please confirm that in the meeting on July 1, 2026, OCC explained that it could not "approve" the Outreach, Education, and Engagement Plan as proposed, without additional information about the types of TVR being implemented.
e. Please explain how the Company intends to comply with Public Act Section 20.

OCC-422 Response:

On June 10, 2026, the Company provided a copy of the draft TVR Customer Engagement Plan to the OCC and DEEP, and requested to meet with both parties to further develop the plan with their consultation, in accordance with Section 21 of Public Act No. 25-173. The Company met with DEEP staff on June 25, 2026, and met with OCC staff on July 1, 2026. Please refer to OCC-422, Attachment 1, and OCC-422, Attachment 2, for the Company's minutes of the respective meetings.

By providing the draft TVR Customer Engagement Plan to both DEEP and OCC on June 10, 2026, and by meeting with both parties to on June 25, 2026, and July 1, 2026, respectively, to solicit and incorporate any feedback they wished to provide, the Company complied with Section 21 of Public Act No. 25-173.

In this discovery request, OCC notes that it could not "approve" the TVR Customer Engagement Plan. The Company agrees. Section 21 of Public Act No. 25-173 required the Company to design and file a "comprehensive customer education and engagement program" in CL&P's pending rate case. Section 21, part (b), indicates any approval of the program required pursuant to Section 21 parts (a) and (b) would come from PURA.

Because the Company's AMI Implementation Plan has not been approved, nor have any AMI-enabled TVR proposals, the TVR Customer Engagement Plan filed in compliance with Section 21 focuses on the existing portfolio of TVR options and necessarily addresses broad AMI-enabled TVR at a high level.

Regarding Section 20, which involves different compliance obligations to be completed by October 1, 2027, CL&P will fully comply with the requirement in Section 20 to file an opt-out TVR proposal by October 1, 2027, while additionally presenting the merits of an opt-in approach to TVR given the status of AMI implementation at that time. As noted in Exhibit CLP-AMI-1, at page 11, "AMI, and its ability to track customer usage by the hour (or potentially even smaller increments), is a prerequisite to implementing time-varying rates as envisioned by Public Act No. 25-173, as codified in Conn. Gen. Stat. §§ 16-19f and 16-243n."

There, in footnote 1, the Company further explained:

> The Company must first implement AMI and gain baseline information and learning on its customers use before the advanced TVR as imagined by Conn. Gen. Stat. §§ 16-19f and 16-243n can be implemented. CL&P will undertake a TVR review and analysis once AMI meters are deployed and the Company has been able to collect requisite information, consistent with the requirement in § 16-243n(b) that the design of such rates, including the price differential between on-peak and off-peak time-varying rates, shall be consistent with empirical research conducted by the electric distribution company. Until then, existing TVR and any proposed interim TVR options submitted to be compliant with the October 1, 2027, deadline in § 16-243n will be bridge solutions only. Advanced TVR offerings require the functionalities of AMI, and therefore the Company anticipates that the ultimate AMI meter deployment schedule will dictate the Company's ability to request approval for advanced TVR offerings for all customers as imagined by Conn. Gen. Stat. §§ 16-19f and 16-243n.

As the Company details in its filed AMI Implementation Plan, Exhibit CLP-AMI-2, a comprehensive Customer Outreach and Engagement Framework, based on the actual details of available rate options and the customer engagement technologies developed, will be a critical part of a successful AMI rollout that culminates in the development of TVR capabilities for all customers after AMI meter installation is complete.

The Company recommends the convening of an inclusive stakeholder process once AMI meter installation begins so that actual customer interval usage data can be used to evaluate TVR options and reach consensus conclusions. Further, the Company's AMI Implementation Plan includes the development of a Rate Comparison Tool that will help customers evaluate their TVR options, whether opt-in or opt-out, which will be available as they amass interval usage data after receiving their meters. As the Company's AMI Implementation Plan proposes that TVR be launched for all customers after they have adequate usage history (e.g., 1 year) to evaluate their TVR options, the updated comprehensive and detailed Customer Outreach and Engagement Framework tied to the future TVR options and customer engagement technologies will be developed over the next 3-5 years.