Date Filed: September 28, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Office of Consumer Counsel

Question:

Environmental Remediation Expense. Refer to WP C-3.13. Provide documentation supporting the Rate Year increases. (bids, quotes, contracts, invoices)

Response:

The Clean Up & Disposal of Waste Material Rate Year adjustment of $378,000 is driven by the adoption of Regulations of Connecticut State Agencies § 22a-134tt-1 et seq. (the Release Based Cleanup Regulations or "RBCRs"). The RBCRs were adopted pursuant to Conn. Gen. Stat. § 22a-134tt, and became effective on March 1, 2026. The Company estimated spend of $1.3 million from 2026 through 2028 to comply with the new regulations. See the table below for the Company's Rate Year Adjustment of $378,000 for Clean Up & Disposal of Waste Material calculation.

Calendar Year	Amount	Months	Monthly	Rate Year Period Mos	Rate Year Adjustment
2027	$ 545,000	12	$ 45,417	6	$ 272,500
2028	210,000	12	17,500	6	105,000
	$ 755,000				$ 377,500

The Company identified an inadvertent error in the Rate Year adjustment calculation for the Manholes & Vaults costs. The Manholes & Vaults Rate Year adjustment is revised to $48,000 from $65,000, driven by percentage increases in pricing for Clean Harbors Environmental Services, Inc. and NRC East Environmental Services Inc. Refer to the table below for the revised Rate Year Adjustment for Manholes & Vaults costs.

	Clean Harbors Environmental Services, Inc.	NRC East Environmental Services, Inc.	Other	Rate Year Amount
Test Year Charges	$ 467,204	$ 28,243	$ 4,861	$ 500,308
% Increase	10.0%	4.0%	0.0%	
Rate Year Adjustment	46,720	1,130	-	47,850
Rate Year Ending	$ 513,924	$ 29,373	$ 4,861	$ 548,158

Refer to OCC-682, Attachment 1 CONFIDENTIAL, for Clean Harbors contract agreement. Refer to Appendix PS-4 of Exhibit D – Pricing Schedule for the Year 4 increase percentage.

Refer to OCC-682, Attachment 2 CONFIDENTIAL, for NRC East contract agreement. Refer to the NRC East's Exhibit D Pricing Schedule. Refer to Attachment 2a for the Year 4 increase percentage.