STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

Docket No. 26-05-10

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY
D/B/A EVERSOURCE ENERGY
TO AMEND ITS RATE SCHEDULES

JOINT REBUTTAL TESTIMONY OF

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Performance Based Multi-Year Rate Plan Metrics Panel

On behalf of

The Connecticut Light and Power Company
d/b/a Eversource Energy

November 18, 2026

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REBUTTAL TESTIMONY OF THE PERFORMANCE BASED MULI-YEAR RATE PLAN METRICS PANEL

I. INTRODUCTION

Q. Please identify the members of the Performance-Based Multi-Year Rate Plan Metrics Panel.

A. The members of the Performance-Based Multi-Year Rate Plan ("PBMRP") Metrics Panel are Douglas P. Horton, Lavelle A. Freeman, Dr. Elli Ntakou, Jess Cain, Jared A. Lawrence, Andrew C. Belden, Marc J. Richards, and Clare B. Connolly.

Q. Have the members of the PBMRP Metrics Panel previously submitted testimony in this proceeding?

A. Yes. On July 14, 2026, we submitted direct, pre-filed testimony to the Public Utilities Regulatory Authority ("PURA") on behalf of Connecticut Light and Power Company, d/b/a Eversource Energy ("CL&P," "Eversource," or "Company") in support of its application for approval of amended rate schedules. Mr. Horton is a co-sponsor of Exhibits CLP-ELP-1 and CLP-AMI-1, including related attachments. Mr. Freeman and Dr. Ntakou co-sponsored Exhibit CLP-TSP-1 and related attachments. Ms. Cain, Mr. Lawrence, and Mr. Belden co-sponsored Exhibit CLP-CUSTOMER-1 and related attachments. Mr. Richards and Ms. Connolly are co-sponsors of CLP-ENV-1 and related attachments.

II. PURPOSE OF TESTIMONY

Q. What is the purpose of your rebuttal testimony?

A. Our rebuttal testimony responds to the direct testimony submitted by Gennelle Wilson and Oliver Tully on behalf of the Office of Consumer Counsel ("OCC"); and Lindsay J. Griffin on behalf of the Acadia Center and Conservation Law Foundation ("AC-CLF").

In particular, our rebuttal testimony responds to certain claims made by OCC and AC-CLF regarding the efficacy of the Company's PBMRP performance incentive mechanisms ("PIMs") and metric proposal. Collectively, our rebuttal to these claims demonstrates that the Company's proposed PIMs and metrics are appropriately designed to provide transparency and accountability during the PBMRP term in a manner that allows the Company to pursue cost efficiencies and meet its obligations for safe, reliable, resilient and affordable electric service, as well as align with public-policy objectives.[1]

Q. How is your rebuttal testimony organized?

A. Our testimony is organized as follows. Section I introduces the witnesses. Section II provides the purpose and organization of our testimony. Section III discusses the purpose of the PIMs and metrics under the PBMRP. Section IV provides rebuttal to specific arguments raised in intervenor testimony. Section V is the conclusion.

III. BENEFITS OF THE COMPANY'S PIMS AND METRICS UNDER THE PBMRP

Q. Why has the Company proposed a four-year PBMRP Plan in this docket?

A. As discussed in Exhibit CLP-ELP-1, the primary purpose and benefit of a PBMRP framework is to support the implementation of the 5-Year Targeted System Performance Plan and to create strong incentives to reduce costs for customers by avoiding frequent rate case filings and encouraging the Company to achieve operational efficiencies during the PBMRP term. These efficiency gains are then passed on to customers as reduced costs in

[1] The Company does not respond to every issue raised in the intervenor testimonies. Silence on any issue should not be construed as agreement on any issue.

the Company's next distribution base rate proceeding. The proposed PBMRP Plan is designed to strike a balance between ensuring adequate revenue support so the Company can commit to a four-year stay-out period and fund necessary capital investments, while also providing financial incentives and operational flexibility that promote greater efficiency in both operations and capital investments for the benefit of customers.

Q. Please explain the relationship between the PBMRP and the Company's proposed PIMs and metrics?

A. The proposed PBMRP PIMs and metrics are designed to provide transparency into the Company's operating performance in key areas during the term of the multi-year rate plan, and ensure the Company maintains high-quality service while implementing efficiency opportunities during the PBMRP term. The primary purpose of the proposed performance based ratemaking framework is to create incentives for the Company to identify and achieve cost efficiencies that will ultimately benefit customers by passing along achieved savings. The cost efficiency incentive is inherent in the stay-out provision within the overall PBMRP – not through PIMs or metrics.

The PIMs and metrics serve a different and equally important function within the PBMRP framework. Since the PBMRP fundamentally provides financial incentives for the Company to identify and implement short term and long-term cost savings through operational efficiencies, the PBMRP could have the undesirable effect of encouraging a utility to scale back on certain performance areas. Therefore, the PIMs and metrics are intended to provide a counterbalance to the inherent cost efficiency incentives under the PBMRP, while also providing customers with a line of sight to answer the question of

whether they are receiving the level of performance that they are paying for. The counterbalancing PIMs and metrics are therefore targeted to key performance areas to provide the right incentives for performance, while assuring customers that the performance that matters most to them is locked in during the PBMRP term. In addition, there are administrative costs associated with tracking, compiling and reporting new data or even reporting similar data in multiple forums. Since the goal of the PBMRP is to drive cost efficiencies leading to increasing affordability, the Company's proposal was designed following careful consideration of whether a potential metric was appropriate to provide accountability and transparency in key performance areas rather than serve as data reporting for limited stakeholder interests.

To that end, the Company has proposed PIMs that provide financial incentives for exceptional improvements in key reliability and customer engagement metrics, or penalties should the Company fall short of its expected performance. These PIMs are designed to encourage the Company to undertake targeted investments in a cost-efficient manner during the PBMRP term to continue efforts to maintain or improve system and customer reliability, as well as customer satisfaction and engagement even while pursuing cost savings.

In addition, the proposed reporting metrics related to receivables and greenhouse gas emissions are targeted at providing transparency on affordability and emission reductions consistent with the public policy objectives of the State. The Company also proposed

discrete cost efficiency reporting metrics to increase transparency on the Company's changes in controllable costs.

IV. RESPONSE TO INTERVENORS

A. OCC Witnesses – Gennelle Wilson and Oliver Tully

Q. What recommendations does the OCC's witnesses make with respect to the Company's proposed PIMS and metrics?

A. Witnesses Wilson and Tully recommend that PURA adopt a Performance Evaluation System untethered to the PBMRP (Wilson and Tully Testimony at 51). Witnesses Wilson and Tully also recommend that PURA approve a suite of PIMs and metrics that more closely align with the draft proposal issued in July 2026 in Docket No. 21-05-15RE02 ("RE02") (Wilson and Tully Testimony, at 52). Specifically, the OCC witnesses make the following recommendations:

- Include planned outages in the calculation of the Blue-Sky SAIDI and SAIFI PIMs (Wilson and Tully Testimony at 56-58);
- Incorporate annual CEMI-5 and CELID-6 performance into the Customer Reliability PIM, while adding a weighting of the components to address the Company's valid concern with how the magnitude of CEMI-5 and CELID-6 could disproportionately distort and drive the composite score (Wilson and Tully Testimony at 58-60);
- Modify the Customer PIM Suite so that the Level 1 DER Interconnection Processing metric is the only PIM and the other metrics are standalone reporting metrics (Wilson and Tully Testimony at 60-61);
- Revise the Digital Customer Engagement component from encouraging additional use of digital transactions that can increase cost efficiencies, to tracking whether customers view and share with third-parties their electricity usage data provided by advanced metering infrastructure ("AMI") to provide insights into customer behavior (Wilson and Tully Testimony at 62-64);

- Include a Non-Wires Solutions ("NWS") Shared Savings Mechanism based on PURA's ongoing redesign of the NWS process (Wilson and Tully Testimony at 67-68);

- Revise the Cost Efficiency reporting metrics to adopt the preliminary metrics contemplated in RE02 (Wilson and Tully Testimony at 71-72); and

- Incorporate all other proposed RE02 metrics into the PBMRP and develop a publicly accessible PBR dashboard (Wilson and Tully Testimony at 70-71, 74-77).

Witnesses Wison and Tully also make various recommendations regarding the proposed incentive and penalty levels for proposed PIMs, which the Company addresses in the Leadership Panel Rebuttal testimony, jointly prepared by Company Witnesses Scacco, Horton and Chatterjee.

Q. Does the Company agree with the OCC's recommendation to include planned outages in the calculation of SAIDI and SAIFI for the purposes of PIMs under the PBMRP?

A. No, the Company disagrees with this recommendation. The OCC witnesses argue that calculation of SAIDI and SAIFI for the purpose of PIMs should more closely align with IEEE's methodology (Wilson and Tully Testimony at 57). However, this argument fails to recognize important distinctions in the purpose of IEEE benchmarking and PIMs, and how incorporating planned outages in a PIM could have unintended consequences.

IEEE annually benchmarks reliability performance of utilities across the nation. IEEE has developed a standardized methodology for creating a comparison across utilities nationally. This is unlike the proposed PIM, which is designed to penalize the Company if its reliability falls below a threshold established based on the Company's own historical performance. The purpose of the PIM is therefore to encourage the Company to make cost effective investments to maintain system level reliability during the PBMRP term while

the Company pursues cost efficiencies. The Company's proposed calculation of SAIDI and SAIFI is designed to measure whether system reliability due to the Company's decisions on whether repairs or upgrades are necessary results in declining reliability during the PBMRP term. Distorting these metrics to align with the IEEE method would lose the critical measurement purpose of this metric.

Planned outages are known, isolated outages typically necessitated to enable critical reliability improvements, infrastructure replacements and system modernization that directly benefit customers through improved long-term reliability and reduced *unplanned* outages. Including planned outages in the calculation of SAIDI and SAIFI as OCC proposes could drive fluctuations in year-over-year performance that have nothing to do with the reliability of service delivered by the Company and, rather, are associated with work undertaken by the Company to *improve* reliability or provide service. The Company's construction work on the system routinely requires service interruptions that the Company handles by notifying customers in advance of the planned work and keeping the outage windows as narrow as possible. The Company also manages the timing and duration of planned outages to minimize customer impacts and inconveniences. Including planned outages would distort the performance results in a given year because the metric would capture outages that have nothing to do with the ability of the system to deliver reliable power and withstand events that drive customer outages. Including planned outages in the metric could also encourage a utility to delay implementation of beneficial system-reliability projects in order to avoid triggering a penalty threshold.

Excluding planned outages from the calculation of SAIDI and SAIFI ensures the metric reflects changes in the reliability and resiliency of the electric distribution system driven by failed equipment, rather than necessary system improvements. Since planned outages represent proactive system improvements that benefit customers through enhanced long-term reliability and service, not performance deficiencies that warrant penalties, they should be excluded from the calculation of SAIDI and SAIFI for the purpose of PIMs.

Q. Does the Company agree with the OCC's recommendation regarding expansion of the proposed Customer Reliability PIM to include annual CEMI-5 and CELID-6?

A. No, as witnesses Wilson and Tully acknowledge, there are significant flaws in including annual CEMI-5 and CELID-6 in a Customer Reliability PIM, including valid issues with the disproportionate impact these metrics could have on the PIM. Therefore, it is reasonable to focus on repeat customers as the Company proposes (Wilson and Tully Testimony at 59). As explained in response to OCC-525, the frequency and/or duration of interruptions for CEMI-5 and/or CELID-6 customers in a particular year can be due to one-off events without repeat in a subsequent year. Since the purpose of a PIM should be to motivate beneficial actions by the Company, including annual CEMI-5 and CELID-6 as a component of a PIM would drive capital investments to prevent one-off events, potentially increasing costs to customers with minimal benefits. The Company's proposed Customer Reliability PIM focuses on customers that experience long duration or frequent service interruptions in multiple years, which are circumstances that should be addressed by the Company, since these situations are more likely to be due to systemic issues.

As the Company also explained in responses to OCC-525, inclusion of annual CEMI-5 and CELID-6 in a composite metric could have unintended consequences due to the disproportionate scale of the submetrics. The percent of repeat CEMI-5 and repeat CELID-6 are numerically much smaller than annual CEMI-5 and CELID-6, and therefore inclusion of annual customer counts would significantly skew achievement of the PIM toward whether one-off random events occurred, rather than Company controllable actions, which OCC agrees is a requirement of any potential PIM (Wilson and Tully Testimony at 53). Assigning an undefined weighting to address the inappropriate impact of incorporating annual CEMI-5 and CELID-6, as OCC's witnesses suggest, does not alleviate the fundamental issue with basing a PIM on random, one-off events. Accordingly, the Company respectfully requests that PURA reject OCC's proposal to include annual CEMI-5 and CELID-6 as a component of the Customer Reliability PIM, regardless of any weighting.

To the extent that OCC seeks to have the number of CEMI-5 and CELID-6 customers reported each year, that value is already reported in the Transmission and Distribution Reliability Performance Report each year. Accordingly, to the extent OCC seeks to understand the scale of annual CEMI-5 and CELID-6, OCC has access to the data without including changes in annual CEMI-5 and CELID-6 customers in the Customer Reliability PIM.

Q. Does the Company agree with the OCC's recommendation to eliminate the Customer PIM Suite and establish a standalone Level 1 DER Interconnection Processing PIM and convert the other components to reporting only metrics?

A. No. As discussed above and in Exhibit CLP-ELP-1, at 104-106, the Company's proposed performance metrics are designed to complement and support the Company's overall PBMRP. Improving customer satisfaction and engagement in the performance areas within the Customer PIM Suite will provide transparency and accountability for the Company to maintain and seek to improve customer service while pursuing cost efficiencies through the PBMRP. Together, the five components (Level 1 DER Interconnection Processing, Digital Customer Engagement, Controllable Average Call Handle Time, Post-Transaction Survey Customer Service Representative Attributes, and Average Discount Rate Enrollment Time) provide a comprehensive measure of customer service performance. The Company selected a composite PIM structure for its customer metrics because customer experience is multidimensional and more appropriately evaluated through a balanced set of performance measures rather than singularly measuring customer metrics in isolation.

Adopting a standalone PIM for Level 1 DER Interconnection Processing, as the OCC witnesses propose, could inadvertently prioritize focus on performance for this metric, which benefits a small group of customers at the possible expense of other important customer outcomes effecting a broad range of customers. The composite structure instead encourages the Company to maintain balanced performance across a full range of customer-focused objectives.

Q. Does the Company agree with the OCC's conclusion that, except for the Level 1 DER Interconnection Processing metric, the components of the Customer PIM Suite do not warrant treatment as a PIM?

A. Each component of the Customer PIM Suite meets the criteria for inclusion in a PIM and requires Company actions that provide meaningful benefits to customers to achieve the metrics. As explained in response to UPA-084, each Customer PIM component is intended to drive a specific operational outcome and deliver benefits to customers through sustained performance improvements.

There are numerous dimensions to the customer experience that no single performance measure can capture, nor that would provide PURA and other stakeholders with an accurate indicator of the level of service that the Company is delivering in relation to the Customer Experience. Therefore, the Customer PIM Suite is designed to provide a holistic assessment of the Company's performance across a variety of customer engagement points to ensure focus on continuing to provide a high-level of customer service across its breadth of customers while the Company pursues cost efficiencies during the PBMRP term. The components collectively reflect a significant cross section of the customer service efforts for the Company by reflecting customer perception of service quality, responsiveness, ease of doing business, and overall satisfaction. The proposed Customer PIM Suite is intended to capture and motivate sustained improvements for the benefit of all customers in order to achieve the PIM, rather than focusing on benefitting one subgroup, as the OCC witnesses suggest.

Digital Customer Engagement Component

The Digital Customer Engagement component measures digital transactions as a percentage of overall customer transactions. Digital transactions include engagement with customers via self-service and alert notifications.

The OCC's position regarding the Digital Customer Engagement Component appears to rest on the premise that, because digital engagement levels are already high, there is little additional customer benefit associated with maintaining or increasing digital engagement performance. That premise overlooks both the value customers derive from continued improvements in digital service channels and the significant ongoing effort required to sustain high levels of customer adoption and satisfaction.

The achievement of high digital engagement today does not mean that future performance is automatic or can be maintained without continued focus and investment. The proposed target of 92.18% is based on actual 2025 performance. Maintaining digital engagement levels above 90% requires continual investment in website functionality, mobile capabilities, customer communications, self-service tools, outage communications, payment options, system reliability, accessibility, and overall user experience. Customer engagement levels are influenced by the quality of these services and can decline if customer expectations are not met.

Contrary to the intervenor's assertion that incremental customer benefit has not been demonstrated, digital engagement provides substantial value. The services offered through digital channels are a cost-effective way to serve customers and ensure that the Company's

web and digital tools provide a valued and satisfying experience. Sustaining and incrementally increasing digital engagement continues to provide customer benefits because each additional digital interaction typically represents a customer choosing a more convenient, self-service option in lieu of a more burdensome, less cost-effective alternative channel. Encouraging continued and expanded use of digital channels will allow customers to complete transactions and obtain information in a cost-effective manner.

Further, contrary to the suggestion that digital engagement will naturally remain high without intervention, customer adoption is directly influenced by the Company's investments in digital platforms and customer experience improvements. While customer preference for digital channels is trending upward, the investments in these digital channels still need to be made; the channels must still work properly; and the customer experience still has to be satisfactory to a level where the customers will still make the digital channels their preferred engagement options on an ongoing basis. The proposed PIM component therefore aligns utility incentives with customer behavior by encouraging the Company to continue investing in digital capabilities that customers find useful and beneficial, thereby increasing utilization of a cost-effective approach to allowing customers to complete transactions and obtain information.

The Digital Customer Engagement metric is an appropriate component of the Customer PIM Suite that incentivizes the Company to maintain and enhance the quality of digital platforms that customers increasingly prefer and rely upon. The proposed target of 92.18% is not intended to reward historical performance, but rather to establish accountability for

maintaining and improving a level of performance that customers have demonstrated they value. The metric directly benefits customers by ensuring continued investment in cost-effective, convenient digital service channels that improve customer satisfaction and operational efficiency.

Controllable Average Call Handle Time

The Controllable Average Call Handle Time component measures the average amount of non-phone time associated with customer interactions.

The OCC witnesses recognize but dismiss the benefit of maintaining and improving customer call handle time under the PBMRP (Wilson and Tully Testimony at 64-65). This position seems to stem from the OCC seeking to extricate the Customer PIM Suite from the PBMRP.

As discussed above, the primary objective of the PBMRP framework is to encourage the Company to pursue cost efficiencies during the stay out term while maintaining or improving in key performance areas. Lowering call center costs and improving answer times will help increase cost-efficiencies while improving customer satisfaction. Incorporating this component into the Customer PIM Suite provides incentives for the Company to focus on improving customer service as a means to pursue cost-efficiencies but also serves to penalize the Company for allowing customer service to decline in pursuit of other cost efficiencies.

Post-Transaction Survey Customer Service Representative Attributes

The Post-Transaction Survey component measures key attributes of Company customer service representatives in areas of courtesy, friendliness, knowledge and concern.

The OCC witnesses argue that this component is inappropriate for inclusion in the Customer PIM Suite because they question the value of the surveys since customers may not be able to assess whether a customer service representative's knowledge is accurate (Wilson and Tully Testimony at 65). The OCC concludes that the potential for a customer to provide a customer service representative a higher or lower score due to their perceptions reduces the value of the metric and therefore the Company should not receive a financial reward for incremental increases in performance. These concerns, however, fail to acknowledge the purpose of the component and the overall structure of the Customer PIM Suite.

The Company proposed this PIM component as a means to evaluate the Company's best efforts to effectively serve customers through non-digital communications. The components of the Post-Transaction Survey also have a strong correlation with overall customer satisfaction. The inclusion of the Post-Transaction Survey component of the Customer PIM Suite is intended to provide an important element of the multi-faceted customer service experience and ensure that the PIM is tied to comprehensive performance.

As far as the focus on whether a customer can independently verify the accuracy of the customer service representative's information, the purpose of the survey is assessing the customer's satisfaction. Similar to a student assessing the knowledge of their teacher in a

new class, while a customer may not always know the full accuracy of the information, the customer can evaluate the apparent knowledge skills of the customer service representative by evaluating the speed, comprehensiveness, and clarity of the information they are provided in an interaction.

Average Discount Rate Enrollment Time

The Average Discount Rate Enrollment Time measures the average number of business days it takes the Company to enroll an eligible customer in the Discount Rate following the date the customer provides qualifying proof of eligibility. This component applies to applications that require manual review and processing, and it *excludes* customers enrolled through state data-matching or Community Action Agencies. Similar to the previous components, this component is meant to provide a different facet of customer service within a comprehensive Customer PIM Suite. Including this component within the PIM Suite, and allowing for a positive financial incentive, as well as financial penalty, is appropriate because it provides the Company with an additional mechanism to encourage timely customer discounts, timely service protections and an overall positive customer experience when vulnerable customers need it.

OCC argues against this component of the PIM Suite because their witnesses allege that more information is needed to establish a financial incentive (Wilson and Tully Testimony at 66). Specifically, the OCC witnesses claim that the Company has not tracked the data underlying the metric historically and therefore there is limited information about current processing times, delays, seasonal variation and resulting customer impacts (Wilson and

Tully Testimony at 66). In addition, the OCC claims that the change from the two-tiered to the five-tiered discount rate may reduce the number of customers contacting the Company to change tiers (Wilson and Tully Testimony at 66-67). The OCC witnesses also claim it is not clear if the Company is tasked with the processing of the customer's financial documentation, or is a third-party, Alorica responsible (Wilson and Tully Testimony at 67).

Although the Company has not tracked historical data for this component, the Company does have significant experience with enrolling customers on the discount rate and has tracked its recent timelines for enrolling an eligible customer in the Discount Rate following the date the customer provides qualifying proof of eligibility. The target for this component is based on the tracked data and reinforced by the Company's historic experience.

Achievement of the metric requires substantial effort by the Company and benefits eligible customers seeking to enroll on the discount rate and receive winter protection of service. While the Company primarily relies on its third-party vendor, Alorica, to process financial hardship documentation, the Company's employees assist during peak periods of higher volume of applications to ensure that processing time is kept to a minimum. Regardless of whether it is Company employees or third-party outsourced partner who performs the financial hardship documentation processing, there are more resources (and associated costs) to process to a two-business day target versus a less timely target. Achieving a two-day turnaround requires the Company to forecast and allocate resources during periods where applications surge, which is typically at the book-ends of the six-month, annual,

"winter protection" period. As discussed in response to OCC-531, including the Average Discount Rate Enrollment Time component within the PIM suite is appropriate because it encourages the Company to process customer applications in a timely manner which benefits customers, while the Company also pursues cost efficiencies during the PBMRP term.

Q. Does the Company agree with the OCC that the Company could obtain an incentive even when significantly underperforming in one component?

A. The Customer PIM Suite is designed as an incentive and penalty mechanism, where the Company is eligible for an incentive if it achieves exemplary composite performance across the components of the PIM suite or incur a penalty if the Company's customer service declines during the PBMRP term. This composite approach ensures that the Company must focus on maintaining and improving performance across the multiple components of the PIM suite. As explained in response to OCC-532, the composite Customer PIM Suite is not designed to provide an incentive for just meeting target performance. The Company must achieve a Composite index of 110 or an average improvement of 10 points to trigger an incentive. Given that some metrics have inherent caps on performance,[2] combined with the requirement that the Company achieve a high composite threshold to even be eligible for an incentive, as a practical matter the Company

[2] As discussed in response to UPA-092, the Post Transaction Survey – CSR Attributes component and the Digital Customer Engagement components have inherent performance caps. The Post Transaction Survey – CSR Attributes cannot achieve an index greater than 119, as this measure cannot exceed 10.0 in actual performance. Digital Customer Engagement cannot achieve an index greater than 108, as this measure cannot exceed 100% in actual performance. As discussed in OCC-528i, there will always be reasons why customers transact on non-digital channels, so that the Company's expectation is that Digital Customer Engagement will never reach 100%.

must perform near or significantly above performance targets to have an opportunity to earn an incentive. Simply, improving significantly in just one component while underperforming in other areas as a practical matter will not result in an earned incentive.

For example, below is a hypothetical example demonstrating that if the Company were to significantly underperform in one component but improve performance in the remaining components, including significant improvements in two components, the Company would still not come close to meeting the incentive threshold for the Customer PIM Suite.

	Performance				Composite Index
	Actual	Target	Direction	Index	
Level 1 DER Interconnection Processing	29.0	35.0	Down is Good	117	
Digital Customer Engagement	95.00%	92.18%	Up is Good	103	
Controllable Average Call Handle Time	106.9	76	Down is Good	59	
Post Transaction Survey - CSR Attributes	8.83	8.43	Up is Good	105	
Average Discount Rate Enrollment Time (Days)	1.1	2.0	Down is Good	145	
Total Score				529	105.8

Similarly, even if the Company performs near the target for some components, it would need to perform unrealistically above the target in a single component to even mathematically achieve the incentive threshold for the Customer PIM Suite.

	Performance				Composite Index
	Actual	Target	Direction	Index	
Level 1 DER Interconnection Processing	4.3	35.0	Down is Good	188	
Digital Customer Engagement	92.18%	92.18%	Up is Good	100	
Controllable Average Call Handle Time	86.2	76	Down is Good	87	
Post Transaction Survey - CSR Attributes	8.43	8.43	Up is Good	100	
Average Discount Rate Enrollment Time (Days)	2.5	2.0	Down is Good	75	
Total Score				550	110

To achieve an incentive under the Customer PIM Suite, as a practical matter, the Company will need sustained efforts to maintain and improve customer service across the range of components to even be eligible for an incentive.

Q. Does the Company agree with the OCC's recommendation to revise the Digital Engagement component to focus on customer use and sharing of data from AMI similar to the RE02 Customer Data Engagement metric?

A. No, the proposed Digital Customer Engagement metric is distinct from the Customer Data Engagement metric set forth in the draft decision in RE02.

The Customer Data Engagement metric tracks customer engagement with AMI energy usage data measuring the number and percentage of residential and commercial customers that have viewed or enabled third parties to use their usage data. By contrast, the Digital Customer Engagement metric measures the full breadth of customer transactions across all digital platforms, including bill payment, outage reporting, service requests, and alert notifications, not just AMI data access.

As discussed above, the Company's proposed Customer PIM Suite is intended to provide transparency and accountability to maintain and improve a broad range of customer service-related functions within the Company's control. Specifically, the Digital Customer Engagement component provides quantifiable, actionable insights into customer behavior and the Company's ability to meet evolving customer expectations and security needs as digital channels increasingly play a part in providing a strong customer experience. Improving use of digital platforms also is a cost-effective method of allowing customers to

complete transactions with the Company and obtain information, which aligns with the objectives of the PBMRP.

The Customer Data Engagement metric supported by witnesses Wilson and Tully does not assess the Company's actions and how they benefit customers. Rather, the Customer Data Engagement metric simply provides insights into whether customers find value in viewing and sharing energy usage data on a more real time basis. With AMI, the Company will be fully accountable for creating and managing the data-sharing capabilities, but third-party suppliers must present compelling value propositions to convince customers to actually share their data. This metric is distinct from the Digital Customer Engagement metric that seeks to demonstrate the success of the Company's efforts to encourage use of a variety of digital platforms as cost-effective alternatives to more burdensome methods of conducting transactions or providing information to customers.

It is also premature to adopt the Customer Data Engagement metric given that AMI is not fully deployed as discussed in Exhibit CLP-AMI-1. The Company has proposed a set of measures to assess the success of AMI deployment as part of the Company's AMI Deployment and Implementation Plan (Exhibit CLP-AMI-2, at 87-89). Accordingly, the Company respectfully requests that PURA reject OCC's proposal to revise the Digital Customer Engagement component to a different, premature metric focused on the narrow issue of whether customers use AMI energy usage data.

Q. Does the Company agree with the OCC's recommendation to include a NWS Shared Savings Mechanism based on PURA's ongoing redesign of the NWS process in the PBMRP?

A. No. As witnesses Wilson and Tully acknowledge, PURA is currently investigating and revisiting the NWS program (Wilson and Tully Testimony at 67-68). PURA has acknowledged that the NWS program suffers from significant structural and methodological limitations and initiated a docket to redesign the NWS process (Docket No. 26-08-08). It is inappropriate to incorporate a performance incentive mechanism tied to a program that PURA itself has determined requires fundamental redesign before it can function effectively.

The Company is committed to providing least-cost solutions to customers and NWS projects provided they are feasible, reliable, and more cost-effective than traditional infrastructure solutions.

Q. Does the Company agree with the OCC's recommendation to revise the Cost Efficiency metrics to incorporate the sub-metrics identified in the RE02 draft decision?

A. The Company respectfully disagrees with the OCC's recommendation to implement the proposed RE02 Cost Efficiency Scorecard with six sub-metrics and instead maintains that the Company's proposed four reporting measures appropriately balance transparency with practical implementation.

The Company's proposed Cost Efficiency metric approach provides meaningful transparency while maintaining practical implementation. Core Operating Expense is defined objectively by the expenses included in the calculation, providing a consistent and

transparent metric throughout the plan term. The metrics utilize readily available data, such as FERC Form 1 and existing regulatory reporting requirements, ensuring accuracy and consistency. The Company's proposal strikes a balance between the benefits of increased transparency and accountability made possible by additional reporting, and the validity, relevance and/or cost associated with that additional reporting.

The OCC witnesses, however, advocate for a broader set of sub-metrics under the Cost Efficiency metric including operating expenditures, controllable operating expenditures, authorized controllable operating expenditure, capital expenditures, capital cost, and total cost (Wilson and Tully Testimony at 71-72). As the Company has explained in response to proposals in RE02, using multiple, standalone sub-metrics does not capture the drivers of costs because it splits costs into categories inconsistent with the integrated nature of utility spending decisions (Docket No. 21-05-15RE02, EDCs Joint Exceptions at 21-22). Isolating cost categories, as OCC recommends, may incentivize inefficient tradeoffs, such as minimizing capital expenditures at the expense of recurring operational costs.

The Company’s proposal, on the other hand, provides transparency into costs that are controllable by the Company and demonstrate the cost efficiencies sought through the PBMRP as explained in Exhibit CLP-ELP-1, at 113-114. The OCC's concern about cost shifting between categories is appropriately addressed through the Company's comprehensive reporting approach without requiring additional sub-metric granularity.

Eversource's proposed four Cost Efficiency Metrics appropriately provide transparency into both controllable operating and capital costs, and support holistic assessment of cost efficiency sought during the PBMRP term.

Q. Does the Company agree with the OCC's recommendation regarding including all proposed reporting metrics from the draft decision in RE02?

A. The Company's proposed metrics are intended to provide transparency and accountability during the PBMRP term and are designed to align with the objectives of the PBMRP as discussed above. The metrics reflect a commitment to meaningful, actionable performance.

A primary objective of the PBMRP is to achieve cost efficiencies that ultimately will result in savings for customers. In the context of metrics, the Company proposes to streamline the data provided under PBMRP and focus PIMs and metrics on items that are indicative of the Company's performance while being mindful of the cost associated with that additional reporting. Reporting data for reporting's sake or to satisfy the interest of a narrow group of stakeholders is not aligned with the cost efficiency and affordability objectives of the PBMRP. Instead, the Company's proposed PIMs and metrics focus on what information adds value and promotes actions aligned with the objectives of PBR.

As demonstrated throughout the Company's initial filing, the Company has not arbitrarily omitted metrics considered in RE02. Rather, the Company has selected metrics that align with the objectives of the PBMRP, avoid duplicative reporting, and focus on areas where the Company can meaningfully influence results.

Further, as previously addressed in Written Exceptions in Docket No. 21-05-15RE02, in response to the first Proposed Final Decision, the Company does not support all the scorecards and metrics under consideration in RE02. For example, the Company has expressed the following concerns with some metrics:

- **Peak Demand** – This scorecard is an inaccurate and inappropriate basis for measuring the electric system's efficiency given that many factors that would influence peak demand are entirely outside of the Company's control (e.g. weather).

- **Beneficial Electrification Data** - The Company does not support this metric since the Company's role in supporting EV adoption is limited to preparing the grid for EV charging stations. Customer adoption of EVs is subject to factors that are outside of the Company's control (e.g. the EV market and customer conduct). Further, the Company does not track the EV registrations of its customers, or heat pump installations of all customers.

- **Power Restoration After Major Storm Metric**: The Company opposes this metric for the fundamental reason that a storm's path, and which towns are impacted, is not within the EDC's control. The Company responds to storm events in compliance with a PURA-approved Emergency Response Plan ("ERP") that follows law and regulation.

- **Environmental Justice Reliability Metric**: For similar reasons, relating to storm restoration practices and circumstances outside the Company's control, the Company opposes any metric on power restoration after major storms. In addition, such reporting would be duplicative with existing reporting post-major storms as well as with the Town Reliability Scorecards that the Company produces annually.

- **Distribution System Losses**: Although the Company supports the proposed methodology, it does not currently have models, resources, or processes in place to accurately calculate Technical Losses as envisioned in the RE02-PFD.

- **DER Services** (specific to the sub-metric for Total MW Enrolled - EV Managed Charging): The Company does not have a measure of MW enrolled because managed charging is a program to shift customer EV charging behavior to off-peak periods. The Company does not collect data on the EV charging demand at a residence.

- **Time-Varying Rate** ("TVR") (specific sub-metric for Amount of Load Reduced by Customer Class as a Result of TVR Adoption): There is neither a baseline nor a

method established to determine the amount of load reduced by Customer Class due to TVR adoption.

- **Additional Accounts Receivable and Uncollectible sub-metrics**: The additional sub-metrics include: (1) average residential monthly arrears; (2) residential customer accounts receivable; (3) actual write-offs for residential accounts; and (4) allowed uncollectible rate. Metrics (1), (2) and (3) are already reported annually in a separate docket, and metric (4) is established in the Company's rate case proceeding and does not change until the time of the next base distribution rate case. Further, the current regulatory protections, discussed in Exhibit CLP-CUSTOMER-1, at 44-45, limit the Company's ability to collect and perform disconnections for non-payment. Therefore, the Company has limited ability to influence these sub-metrics.

Although the OCC witnesses argue that metrics and scorecards provide transparency even where financial incentives are inappropriate (Wilson and Tully Testimony at 56), transparency is most valuable when it illuminates meaningful performance indicators. As discussed above and in the Company's initial filing, the performance metric proposals provide meaningful insight into performance and demonstrate whether the PBMRP's anticipated benefits are realized, while avoiding the administrative burden and potential confusion of reporting metrics in multiple forums or that do not meaningfully provide transparency of the Company's achievement of the objectives of the PBMRP.

To the extent that OCC seeks general reporting metrics independent of any performance based ratemaking proposal, discussion of that class of metrics should be determined through the ongoing RE02 proceeding. However, the Company encourages PURA and stakeholders to consider the cost of tracking and reporting data and how those costs align with the objectives of promoting cost efficiencies.

Q. Does the Company agree with the OCC's recommendation to develop a reporting dashboard for PIMs and metrics?

A. The Company proposes to report on the PBMRP PIMs and metrics through an annual filing with PURA, thereby providing transparency and public access to the data. While the Company appreciates that the OCC's witnesses may prefer development of a dashboard, the Company notes that developing and maintaining dashboards requires resources and increases costs. PURA and stakeholders should carefully assess the costs and value of any dashboard to customers when considering any directives for implementation of a particular reporting method.

B. Acadia Center and Conservation Law Foundation Witness – Lindsay Griffin

Q. Please describe the position taken by the AC-CLF's witness Ms. Griffin with respect to the Company's proposed PIMs.

A. Ms. Griffin recommends that PURA reject the Company's proposed PIMs and adopt the PIM designs set forth in the proposed decision in RE02, but not the incentive designs proposed in RE02 (Griffin Testimony at 62-63, 65-66).[3]

Ms. Griffin claims that System Reliability PIM design "weaken the PIMs' ability to provide the data and performance measures PURA needs to assess the Company's performance" because the Company proposes (1) setting the threshold using 2022-2026, even though 2026 has not yet concluded, (2) recent SAIDI has been increasing, and (3) the proposed

[3] Ms. Griffin also recommends adjustments to the triggers and performance incentive pool (Griffin Testimony, at 63-66). The Company addresses these points in the Leadership Panel Rebuttal testimony jointly prepared by Company Witnesses Scacco, Horton and Chatterjee.

penalty does not reach the maximum level until two standard deviations (Griffin Testimony, at 60-61).

Ms. Griffin also argues that the Customer Reliability PIM should be designed the same as proposed in RE02 because the Company's proposal does not include the percentage of repeat customers (Griffin Testimony at 61). Ms. Griffin also claims that the Company proposes to receive an incentive if performance is "up to one standard deviation worse than the 5-year historical average" and instead the Company should receive no incentive for improving CEMI-5 and CELID-6 reliability (Griffin Testimony at 63).

With respect to the Customer PIM Suite, similar to the OCC witnesses, Ms. Griffin argues that the Level 1 DER Interconnection component should be a separate standalone PIM because the witness is concerned that slow interconnection processing could be offset by strong performance of other customer service metrics and interconnecting customers may face delays (Griffin Testimony at 61).

Lastly, similar to the OCC witnesses, Ms. Griffin recommends that PURA adopt the NWS Shared Savings Mechanism.

Q. Does the Company agree with Ms. Griffin's conclusions and recommendation regarding the System Reliability PIMs?

A. No. The Company has proposed to use the most recent five years historical SAIDI and SAIFI to establish the thresholds for the PIM, which is consistent with the proposed PIM in RE02. The fact that 2026 data is not available at this time is not a flaw and does not by default mean that the threshold will be easier to achieve as the AC-CLF witness suggests.

Using the most recent five years, including 2026, establishes the system's most recent performance to assess whether the Company has achieved improvements in system reliability during the PBMRP; rather than basing whether to assess a penalty on system conditions more remote in time.

Further, while SAIDI in 2025 was comparatively higher than the prior four years, SAIFI in 2025 was comparatively lower than prior years (Exhibit CLP-TSP-1, at 76). Accordingly, while SAIDI's five-year average may be higher due to 2025 performance, SAIFI's five-year average is lower due to the same year's performance. This dichotomy demonstrates that seeking to establish a baseline based on preferred levels as AC-CLF suggests is arbitrary and futile. Using the most recent five-years of data prior to the start of the PBMRP term, however, establishes a fair representative baseline of the system to assess whether the Company under the PBMRP has improved system reliability.

As discussed above in response to OCC's recommendations, the Company's proposed System Reliability PIMs are designed to assess whether the Company takes steps to improve system reliability under the PBMRP. The proposed baseline (2022-2026) and methodology to exclude planned outages is tailored to appropriately assess the Company's efforts and penalize the Company for failing to meet the PIM threshold.

With respect to the sliding scale penalty, the Company respectfully disagrees with Ms. Griffin's suggestion that the maximum penalty should be assessed as soon as the PIM threshold is met. The Company's proposed sliding scale has some significant advantages over the binary approach AC-CLF proposes. First, the sliding scale encourages the

Company to minimize degradation in system performance even if the PIM threshold will be met. Under a binary approach, once the threshold is achieved, the Company will be assessed the full penalty and the degree to which the Company exceeded the threshold is immaterial. By implementing a sliding scale penalty structure, the Company has an incentive to minimize the extent of decline in reliability even if it is unable to avoid meeting the threshold in the first place. Accordingly, the Company respectfully urges PURA to reject the AC-CLF proposal to assess the maximum penalty for simply triggering the System Reliability PIM.

Q. Does the Company agree with Ms. Griffin's conclusions and recommendation regarding the Customer Reliability PIM?

A. As discussed in Exhibit CLP-TSP-1 and above, the Company's proposed Customer Reliability PIM does differ from the PIM under consideration, but not approved, in RE02. The proposed RE02 PIM includes, as Ms. Griffin notes, a sub-metric for percent repeat CEMI-5 or CELID-6 customers divided by the total number of CEMI-5 or CELID-6 customers which could have unintended consequences. Adopting these sub-metrics could reward the Company simply if the number of unique CEMI-5 and CELID-6 customers increases, even if the number of repeat CEMI-5 and CELID-6 customers remains unchanged (see Exhibit CLP-TSP-1, at 82-83). This would be counter to even Ms. Griffin's stated goal to focus "specifically on repeat appearances by the same customers year over year to identify chronically underserved customers." (Griffin Testimony at 80).

Further, as OCC's witnesses concede, there is a legitimate flaw in the proposed RE02 composite PIM due to the disproportionate scale of the sub-metrics (Response to

OCC-525). The percent of repeat CEMI-5 and repeat CELID-6 are numerically much smaller than the other sub-metrics and do not meaningfully impact the value of the composite metric. Therefore, the proposed customer reliability PIM in the RE02 Proposed Final Decision would be driven by annual CEMI-5 and CELID-6 customers, rather than repeat customers. The Company's historical data shows that annual CEMI-5 and CELID-6 customer counts are orders of magnitude higher than repeat CEMI-5/CELID-6 customers and therefore will dwarf the impact of repeat customers within the PIM. Accordingly, the Company did not include the percent of repeat CEMI-5 and repeat CELID-6 in the proposed Customer Reliability PIM.

The Company's proposed metric instead focuses on reducing repeat customers that experience long-duration interruptions and/or frequent interruptions (Response to OCC-525). The Company chose to focus on repeat customers because the frequency and/or duration of interruptions for CEMI-5 and/or CELID-6 customers in a particular year can be due to one-off events without repeat in a subsequent year. In other words, while CEMI-5 and CELID-6 represent edge cases of performance, isolated events that result in CEMI-5 or CELID-6 customers should not all be actionable as those events would drive investment to resolve largely isolated or infrequent events. However, customers that experience long duration or frequent service interruptions in multiple years should be addressed by the Company, since these situations are more likely to be due to systemic issues. Accordingly, the Company has designed the PIM to focus on repeat CEMI-5 and CELID-6 customers.

With respect to the threshold for the Customer Reliability PIM, the AC-CLF witness states that "the threshold would pay a reward for performance up to one standard deviation worse than the 5-year historical average" (Griffin Testimony at 63). This is false. The Customer Reliability PIM seeks to lower the average count of repeat CEMI-5 and CELID-6 customers, accordingly, the threshold is set below the five-year historical average (Exhibit CLP-TSP-1, at 83). Setting the threshold in this manner requires the Company to reduce the average number of repeat customers by at least one standard deviation below the historic five-year average.

Lastly, the Company's proposed incentive structure is consistent with the proposed RE02 incentive structure for the Customer Reliability PIM. The upside only PIM recognizes that the Company will need to undertake significant effort to reduce repeat CEMI-5 and CELID-6 customers, which represent a very small portion of the overall customer base. An incentive, rather than penalty, based PIM is appropriate to encourage the Company to pursue the PIM while also seeking cost-efficiencies under the PBMRP.

Q. Does the Company agree with Ms. Griffin's conclusions and recommendation regarding the Customer PIM Suite?

A. No. For the same reasons discussed above in response to the recommendations by OCC's witnesses, the Company does not support a standalone Level 1 DER Interconnection Processing PIM. It is not appropriate to prioritize focusing on performance for this metric, which benefits a small group of customers, at the possible expense of other important customer outcomes affecting a broad range of customers. The composite structure of the Customer PIM Suite instead encourages the Company to maintain balanced performance

across a full range of customer-focused objectives, including improving interconnection application processing timelines.

Q. Does the Company agree with Ms. Griffin's recommendation regarding a potential NWS Shared Savings Mechanism?

A. No. For the reasons discussed above in response to OCC's witnesses' recommendations, the Company does not support establishing a PIM tied to an NWS program that PURA is actively seeking to redesign. Further, the Company maintains that it does not need the shared savings mechanism, as proposed, to pursue NWS projects provided they are feasible, reliable, and more cost-effective than traditional infrastructure solutions. The Company is committed to providing least-cost solutions to customers.

Q. Please describe the recommendations proposed by the AC-CLF's witness Ms. Griffin with respect to non-PIM performance metrics.

A. In addition to the modifications to the PIMs discussed above, Ms. Griffin recommends that PURA adopt all the performance mechanisms proposed in RE02, regardless of the Company's PBMRP is approved, with certain modifications.

Specifically, Ms. Griffin on pages 81-82 of her testimony proposes:

(1) Adopt the Customer Reliability metric as a scorecard rather than a PIM (as already discussed above);

(2) Adopt the Time Varying Rate ("TVR") metric proposed in RE02 as a scorecard with targets and require the reporting distinguish between low and moderate income ("LMI") and non-LMI customers;

(3) Adopt the Community Engagement metric proposed in RE02 as a scorecard with targets and add a sub-metric for assessing Environmental Justice community representation on advisory boards; and

(4) Adopt the Level 2 DER Interconnection Scorecard as proposed in RE02, but consider converting the scorecard to a PIM if Level 2 interconnection processing times increase while Level 1 interconnection processing times decrease.

Q. Does the Company agree with Ms. Griffin's recommendation regarding adopting all of the reporting metrics and scorecards proposed in RE02 in this proceeding?

A. No. Although the Company appreciates the on-going efforts of PURA and stakeholders in RE02 and looks forward to providing comments on the Proposed Draft Decision in that proceeding should PURA opt to re-start that docket in the future.

For this proceeding, the Company has proposed a comprehensive PBMRP with associated PIMs and metrics. As discussed above, a primary objective of the PBMRP is to provide incentives for the Company to pursue cost efficiencies during the PBMRP term. In the context of performance metrics, the Company proposes to streamline the data provided under PBMRP and focus PIMs and metrics on items that are indicative of the Company's performance while being mindful of the cost associated with that additional reporting. Reporting data for reporting's sake or to satisfy the interest of a narrow group of stakeholders is not aligned with the cost efficiency and affordability objectives of the PBMRP. Instead, the Company's proposed PIMs and metrics focus on what information adds value and promotes actions aligned with the objectives of PBR. Accordingly, the Company does not support incorporating additional metrics that are still pending in RE02 and prior to the Company and other stakeholders having an opportunity to provide feedback in that proceeding.

Q. Does the Company have any responses to Ms. Griffin's proposed recommendation regarding modifications to certain PIMs and metrics proposed in RE02?

A. The Company has reviewed the proposed modifications Ms. Griffin proposes to the Customer Reliability PIM and as discussed above disagrees with the proposed modifications. Please refer to pages 30-32 of this testimony.

The Company also opposes adopting a TVR reporting metric at this time since AMI is not fully deployed. The Company, however, has submitted a TVR Customer Engagement Plan which it plans to implement to educate customers about TVR and EV rate options that are currently available (Exhibit CLP-RATES-8). The TVR Customer Engagement Plan includes a scalable framework that can be applied to future TVR offerings as they are introduced (Exhibit CLP-RATES-8). While education efforts regarding current offerings is on-going, the Company recommends that the decision to establish a TVR reporting metric be reviewed in RE02 and implemented in future PBR terms when AMI deployment expands and TVR designs evolve.

Regardless of whether and when PURA implements a TVR reporting metric, the metric should be based on established customer classes and should not include enrollment targets. At least currently, TVR is an optional rate design for customers. Although participation in a TVR may provide benefits if customers alter their usage behavior because of the rate, establishing targets for the Company to meet by encouraging enrollment on TVR may not be in customers' best interest. At this stage of AMI deployment and TVR designs, the Company strongly opposes establishing targets for customer enrollments in TVR until the

Company and PURA have more opportunity to understand the impacts of TVR designs and customer acceptance.

Similarly, the Company does not support setting targets for the sub-metrics of the Community Engagement metric under consideration in RE02. Although the Company may provide additional comments on the proposed structure of the Community Engagement metric within the RE02 proceeding, there is no basis to establish targets for this form of metric. The Community Engagement metric includes data on number of engagement events, attendance levels, and actions customers take in response. The Company has no control over customer decisions to participate in an event, nor what a customer chooses to do with information obtained during any engagement event. Accordingly, setting targets for number of events held with customer class sub-targets, participation levels, and customer follow-up actions, such as enrollment in a program, is unreasonable. Further, setting a target for adopting customer feedback into utility planning is inappropriate as a target presumes that such feedback warrants incorporation. The Company's understanding is that the purpose of the Community Engagement metric is to gather information about utility engagement efforts and whether the activities translate into other actions. This information gathering is more appropriate through metric or information reporting, than a scorecard; however, regardless of form should consider the cost and resources necessary to track and report on the various components, particularly segmenting data by demographics.

Lastly, it is premature to opine on modifying a Level 2 DER Interconnection metric that has not been implemented based on the results of another metric that has also not been implemented. Accordingly, the Company urges PURA to not adopt AC-CLF's recommendations and instead continue to investigate the appropriateness of proposed RE02 metrics within the RE02 proceeding.

V. CONCLUSION

Q. Does this conclude your testimony?

A. Yes.