STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	:	**DOCKET NO. 26-05-10**
	:	**SEPTEMBER 3, 2026**

OBJECTION OF ALLCO FINANCE LIMITED TO THE CONNECTICUT LIGHT AND POWER COMPANY'S MOTION FOR EXTENSION OF TIME (ALLCO SET 1)

Allco Finance Limited ("Allco") respectfully objects to the September 2, 2026 motion of The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P" or the "Company") for a ten-calendar-day extension of time to respond to thirteen of the nineteen interrogatories Allco served on August 20, 2026 (ALLCO-001 through ALLCO-009, ALLCO-013, ALLCO-015, ALLCO-017, and ALLCO-018). The Company does not claim that the information is voluminous, hard to locate, or unavailable. The sole ground offered is that the Company needs time "to coordinate with the Company's litigation counsel in the federal court lawsuit to determine the extent to which CL&P can respond to each" interrogatory. Motion at 2. That is not a request for time to answer; it is a request for time to decide how much not to answer. The motion should be denied or, at most, granted only on the conditions set out in Section V below.

I. THE THIRTEEN INTERROGATORIES SEEK CORE RATE-CASE INFORMATION ABOUT SUBJECTS THE COMPANY ITSELF PUT AT ISSUE.

Every one of the thirteen interrogatories the Company seeks to defer asks about the Company's own books, its own proposed revenue requirement, or representations the Company itself made in its own exhibits in this docket. ALLCO-001 through ALLCO-006 ask in which FERC accounts the Company records contributions in aid of construction and related interconnection collections; how those amounts, and the deposits and security the Company holds from interconnection customers, are reflected in rate base and the Test Year and Rate Year revenue requirements; how the Company derives the overhead percentages it applies to interconnection charges; and whether refund obligations the Company's own final accounting reports establish are recorded as liabilities and reflected in the revenue requirement. These are bookkeeping and

revenue-requirement questions. It is difficult to imagine discovery more squarely within a rate proceeding.

ALLCO-007 through ALLCO-009 and ALLCO-013 ask for the queue and hosting-capacity data behind statements the Company volunteered in its own direct case — that "about 260 MW is unable to interconnect without major substation upgrades" and that "over 550 MW of large solar projects are similarly stuck in interconnection queues" (Exhibit CLP-TSP-2 at 43) — and for the scope, cost, and queue effects of the "Bul Substation near Hampton" that anchors the Company's own SHARE proposal (Exhibit CLP-TSP-3 at 146). ALLCO-015 and ALLCO-017 ask for the "recent historical performance" data on which the Company says it based the proposed 35-business-day target for its own proposed DER interconnection performance metric (Exhibit CLP-CUSTOMER-1 at 35), and for elapsed-time data bearing on that same metric. ALLCO-018 asks whether compensation loaders are embedded in the overhead rates charged to interconnection customers. The Company wrote these exhibits, proposed these mechanisms, and asked the Authority to act on them. Having put these subjects at issue, it cannot claim to need lawyers in another forum to tell it whether the data supporting its own filings "can" be disclosed to the parties testing them.

The Company's observation that the thirteen interrogatories also "pertain[] to claims being adjudicated" in federal court, Motion at 2, gets it nowhere. Information relevant to a rate application does not become less discoverable in the rate proceeding because it is also relevant somewhere else. If anything, the Company's characterization concedes that the factual record it built in this docket and the conduct challenged in the federal action share a common core — which makes the information doubly relevant, not deferrable.

II. THE STATED GROUND IS NOT GOOD CAUSE.

First, the facts are the facts. Account balances, refund liabilities, queue positions, and elapsed processing times do not change depending on which of the Company's lawyers reviews them before they are transcribed into a discovery response. The Company identifies no effort that the extension would permit other than legal coordination "to determine the extent to which CL&P

can respond" — that is, to formulate objections and calibrate withholding.

Second, there is no federal discovery obligation to coordinate with. Allco's motion in the federal action seeks *leave* to commence discovery before the Rule 26(f) conference; unless and until that motion is granted, no federal discovery is operative and the Eversource defendants owe no federal responses. The only operative obligation the Company faces with respect to this subject matter is the one in this docket — the September 4, 2026 deadline it now seeks to move. A pending motion in another forum that imposes no obligation on the Company cannot excuse the obligation it actually has here.

Third, if the Company believes any interrogatory is objectionable, the remedy is to object — by the deadline, stating its grounds — so that any dispute can be presented to the Authority promptly and resolved within the schedule. A party may not obtain through an unexplained extension what it would otherwise have to justify through a stated objection. Postponing both the answers and the objections serves no purpose except to push any dispute deeper into the procedural schedule.

Fourth, the timing undercuts the claimed need. Allco served Set One on August 20, 2026. The Company held the interrogatories for thirteen days and moved two business days before the deadline. Nothing happened in the interim that changed what Set One asks or the Company's ability to answer it; the only intervening event the motion identifies is Allco's August 31 federal motion for leave — which, as noted, imposed no obligation on the Company at all.

Fifth, the rationale the Company has chosen carries a cost-recovery consequence the Authority should note now. The "coordination" the Company describes — its litigation counsel in the federal action, Day Pitney LLP, reviewing and shaping the Company's discovery responses in this docket — is, by the Company's own account, work performed in connection with this rate proceeding. Conn. Gen. Stat. § 16-243p(b) prohibits the Company from recovering through rates any direct or indirect costs associated with a rate proceeding, including outside-counsel fees. The Company's response to OCC-309 shows Day Pitney billings embedded in the outside legal expense the Company escalates into its proposed Rate Year revenue requirement. Now that the

Company has told the Authority that its federal litigation counsel's work extends to this docket's discovery, the Company will need to separately record all time charges of Day Pitney LLP (and of any other counsel) that are directly or indirectly related to this rate case, so that those disallowed charges are identified and excluded from the revenue requirement in this proceeding and from any future claim for recovery. The Authority should direct the Company to do so whatever the disposition of this motion.

III. THE COMPANY IS SEEKING DELAY IN BOTH FORUMS, EACH TIME POINTING TO THE OTHER.

In the federal action, the Eversource defendants moved to extend their deadline to respond to the complaint to October 19, 2026 — more than three times the period Rule 12(a) allows — over Allco's offer of a fourteen-day extension. That motion was granted. Now, in this docket, the Company cites the *existence* of that same federal action as the reason its regulatory discovery responses must wait. The Authority should decline to let the coincidence of proceedings — a coincidence created by the Company's own conduct toward interconnection customers — become a rolling justification for delay in both.

IV. THE EXTENSION WOULD PREJUDICE ALLCO.

The Company asserts that "no party in this docket will be prejudiced." Motion at 2. Allco will be. The thirteen deferred interrogatories are the heart of Allco's Set One: the CIAC and refund accounting, the queue data behind the Company's SHARE proposal, and the baseline data for the Company's proposed performance metric. Allco's follow-up discovery, its testimony, and its hearing preparation in this compressed schedule all build on these responses; a ten-day slip at the front of that chain compounds through it. ALLCO-004 and ALLCO-005, moreover, concern refund obligations the Company's own final accounting reports have already quantified and that remain unpaid — information the Company has at its fingertips. And the Company's selection is conspicuous: of nineteen interrogatories, the thirteen singled out for deferral are precisely those directed to the Company's treatment of interconnection customers — the newest intervenor's core subject matter — while discovery served by every other party continues to be answered on

schedule.

V. IF ANY EXTENSION IS GRANTED, IT SHOULD BE CONDITIONED.

If the Authority is nonetheless inclined to grant the Company additional time, Allco respectfully requests that the extension be conditioned as follows: (1) any objections to the thirteen interrogatories shall be filed by September 4, 2026 — the current deadline — stating their grounds with specificity, so that any disputes can be presented to the Authority without waiting for the extended date; (2) the Company shall serve full and complete substantive responses to all thirteen interrogatories no later than September 14, 2026, without objections, qualifications, or withholding premised on the pendency of Case No. 3:26-cv-01277 or on coordination with litigation counsel; (3) no further extensions of time shall be granted with respect to ALLCO Set 1; (4) the extension shall not affect the September 4, 2026 deadline for the six interrogatories the Company has not sought to defer (ALLCO-010 through ALLCO-012, ALLCO-014, ALLCO-016, and ALLCO-019); and (5) the Company shall separately record, and shall exclude from the revenue requirement in this proceeding and from any future claim for recovery, all time charges of Day Pitney LLP and any other counsel that are directly or indirectly related to this rate proceeding, consistent with Conn. Gen. Stat. § 16-243p(b)..

VI. CONCLUSION.

The Company offers no reason it cannot state the contents of its own books and the data behind its own exhibits by the deadline the Authority's rules set. The motion should be denied. In the alternative, any extension should be granted only on the conditions set forth in Section V.

Respectfully submitted,

ALLCO FINANCE LIMITED

/s/ Thomas Melone
Thomas Melone
Juris No. 438879
Chief Executive Officer
Allco Finance Limited
777 West Putnam Avenue, Suite 300
Greenwich, CT 06830
Phone: (212) 681-1120
Email: Thomas.Melone@AllcoUS.com

CERTIFICATION

This is to certify that on this day, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies were served upon each person designated on the Authority's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

/s/ Thomas Melone
Thomas Melone