STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**SEPTEMBER 21, 2026**

THE OFFICE OF CONSUMER COUNSEL'S
NINETEENTH SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **October 5, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or

control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-753 through OCC-813 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-753. (Company Vehicles)
a. Please provide the Company's policies regarding provision of a Company vehicle to employees and/or employees' responsibilities regarding Company vehicles.;
b. Are employees permitted to drive Company vehicles after work hours?;
c. Are employees permitted to drive Company vehicles home?

OCC-754. (Company Vehicles) Please provide an unlocked Excel file listing for years 2023, 2024, and 2025: each Company vehicle assigned to a specific employee (i.e., the year, make, and model of the vehicle); the employee to which it was assigned; that employee's job title/position; if the employee is union or non-union; and if the employee was permitted to drive the vehicle home and/or use the vehicle outside of work hours. For any employee noted as permitting to drive the vehicle home

and/or outside of work hours, please explain why the Company determined such permission was necessary.

OCC-755. (Capital Structure) Is the Company's currently approved capital structure 53% Common Equity, 1.62% Preferred Stock, and 45.38% Long Term Debt?

OCC-756. (Capital Structure) Referring to page 68 of Exhibit CLP-ROE-1. Is preferred stock more costly compared to common equity?

OCC-757. (WACC) Did the Company do any weighted average cost of capital analysis (WACC) which compared various debt percentages compared to equity. Such as 60% debt to 40% equity, 55% debt to 45% equity, and 40% debt to 60% equity.

OCC-758. (Retained Earnings) Referring to OCC-518 Response. Are ratepayers paying a cost of equity outlay for retained earnings?

OCC-759. (Retained Earnings) Referring to OCC-518 Response. Is the equity related to retained earnings eligible to earn the authorized return on equity?

OCC-760. (Retained Earnings) Referring to OCC-518 Response. Why is retained earnings eligible to be included in rate base?

OCC-761. (Retained Earnings) Are ratepayers double paying for retained earnings because they paid the Company to create the earnings which were retained and later on pay a cost of equity on the retained earnings?

OCC-762. (Rate Base) Should the rate base be subtracted by amount of customer already paid for retained earnings?

OCC-763. (Retained Earnings) Should utility companies have any retained earnings if ratepayers are paying for the Company debt and equity costs on the entire rate base?

OCC-764. (Special Dividend) Why does the Company not pay out a special dividend every year to remove the retained earnings?

OCC-765. (Retained Earnings) If all retained earnings were paid out in the form of a special dividend yearly could the Company get the necessary common equity and debt investment to fund the Company?

OCC-766. (Retained Earnings) What is the relationship between retained earnings and lack of flotation costs for retained earnings?

OCC-767. (Cybersecurity) Please refer to OCC-128 Attachment 1, section 8.1, Please provide a copy of the Data Breach Incident Response Manual. Please provide information regarding the Manual, including when it was originally developed, when it was most recently updated, and how the Company incorporates lessons learned from data breach incidents into subsequent updates to the Manual and its processes. Please provide an example of when the process in the Manual was used/followed.

OCC-768. (Cybersecurity) Has the Company ever determined, through its vendor security review process, that a prospective or existing vendor's security controls or practices were insufficient? If so, please describe the circumstances, including (1) what security deficiencies were identified, (2) whether the vendor was permitted to proceed or continue providing services, and (3) what action the Company took in response—for example, requiring remediation, imposing additional security requirements, delaying or denying the engagement, or terminating the vendor relationship.

OCC-769. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 76-77. Please confirm that this vendor was on standby for 13 hours on March 12 and for 13 hours on March 13 and performed no work during that time.

OCC-770. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 79-80. Please confirm that this vendor was on standby for 16 hours each day on March 11 and March 12 and performed no work during that time.

OCC-771. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 86-88. The dates on the time sheet (3/11-3/13) do not match the dates on the Tree Contractor Work Location (3/9-3/12 and 3/15). Please clarify the dates for which work is being charged or this invoice.

OCC-772. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 91-93. Please clarify if this crew performed any work or was stationed at the "Darien Yard" the entire time.

OCC-773. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 94-96. Please clarify if the crew performed any work or was on standby at the Cheshire Work Center for 3 hours on March 11 and 13 hours on March 12.

OCC-774. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 97-99. Please clarify if the crew performed any work or was on standby at the Cheshire Work Center for 3 hours on March 11 and 13 hours on March 12.

OCC-775. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 97-99.

a. It appears on page 104 that the work order and activity code has white out and a new work order and activity code was added. Please indicate what was originally written in those boxes and who changed them.
b. Please clarify if the crew performed any work or was on standby at the Cheshire Work Center for 3 hours on March 11 and 13 hours on March 12.

OCC-776. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-03)(MS24E), p. 106-108. Please clarify if this crew performed any work or was on standby for 3 hours on March 11 and 13 hours on March 12.

OCC-777. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-04)(MS24E), p. 4-6. Please clarify if the crew performed any work or was on standby at the Cheshire Work Center for 3 hours on March 11 and 13 hours on March 12.

OCC-778. (MS24E) Please refer to Exhibit ACCT-2(CLP-5A-04)(MS24E), p. 7-9. This invoice and the associated time sheet indicate work performed on March 18-March 22, 2024, and indicate only that the work was for "STRM" without indicating a specific event. Please explain why the Company allocated these invoices to event MS24E and how it verified this allocation.

OCC-779. Refer to Exhibit CLP-ADDITIONS-12. Please provide, for each year 2017 through 2025, the approved capital plan and actual expenditures by category. For each category and year in which actual expenditures exceeded the plan, identify the projects responsible, explain the variance, and provide the document authorizing the excess.

OCC-780. Exhibit CLP-ADDITIONS-12 shows a 2023 Connecticut Distribution plan of $466.4 million (PDF p. 121) against 2023 actual expenditures of $557.9 million (PDF p. 145). Explain each driver of the $91.5 million variance in dollar terms, identify each project or program added to the 2023 plan after the plan was set, and provide the 2023 capital variance analysis presented to Company management and to the Board of Trustees.

OCC-781. Exhibit CLP-ADDITIONS-12 at p. 167 identifies as the first major variance driver for 2024 vs 2025 “Decrease in overall CT capital plan due to regulatory recovery risk.” Explain what the Company means by that phrase, and identify each investment deferred, reduced or cancelled in the 2025 plan for that reason, with the amount, the period of deferral, and the reliability or safety consequence assessed at the time, together with the documents recording each decision. State whether any such investment is now included in the docket no. 26-05-10 or specifically in the proposed TSP Plan in Exhibit CLP-TSP-1.

OCC-782. Exhibit CLP-ADDITIONS-12 at p. 121 attributes the decrease in planned 2023 Basic Business expenditures to “unusually high emergent work ($34M) in 2022.” Identify the work comprising that $34 million by project or work order, and for each event provide date, location, asset class, failure cause and cost, and whether the asset had previously been assessed as deficient. State the criteria the Company applies to classify work as emergent rather than planned, and provide the written standard in effect in 2022.

OCC-783. Exhibit CLP-ADDITIONS-12 shows the planned Basic Business line item for emergent equipment replacement rising from $46 million in the 2019 plan (p. 44) to $71 million in the 2025 plan (p. 166). Provide the planned and actual amount for this line item for each year 2017 through 2025, explain the increase and provide the analysis supporting the 2025 amount. Reconcile the increase with the statement in Exhibit CLP-TSP-3 at p. 55 that “As proactive asset health investment increases in future years, emergent work is anticipated to decrease.”

OCC-784. Exhibit CLP-ADDITIONS-12 refers at several points to the capitalization of major storm costs. State the amount of storm cost capitalized to Basic Business in each year 2017 through 2025, provide the accounting policy distinguishing capitalized storm cost from operation and maintenance expense, and identify any amount included both in those capitalized totals and in the storm costs for which recovery is sought in Exhibit CLP-STORM-1.

OCC-785. Exhibit CLP-ADDITIONS-12 shows Regulatory Commitments actual expenditures of $116 million in 2017 (p. 28) against $5.0 million planned for 2025 in the renamed Regulatory category (p. 167). Explain the decline, and identify each regulatory commitment satisfied between 2017 and 2025 with its year of completion, and each commitment outstanding at December 31, 2025. Also, state when and why the category was renamed.

OCC-786. Across the Key Investment pages of Exhibit CLP-ADDITIONS-12, resiliency work: right-of-way lines, pole integrity, smart switches and substation security, appears under Regulatory Commitments in the 2019 through 2022 plan books and under Reliability from 2023. State when the reclassification was made and why, and provide this work on a consistent basis for each year 2017 through 2025. Substation security no longer appears in that line item from 2023; state where it is now reported.

OCC-787. Exhibit CLP-ADDITIONS-12 at p. 145 refers to "significant Line capacity project carryover work from 2022 that led to higher spending in 2023." For each year 2017 through 2025, identify every project whose spending carried from one plan year into the next, with the planned and actual in-service date, the planned and actual cost, and the reason for the delay.

OCC-788. Exhibit CLP-ADDITIONS-4 reports project number, description, category, type and cost, but no asset quantities. For every project and work order listed, provide the assets installed, replaced or retired by asset class and quantity, in native electronic format joinable to that exhibit by project number.

OCC-789. For each annual program on the Annual Projects tabs of Exhibit CLP-ADDITIONS-4, provide the unit cost applied in each year 2017 through 2025 – per pole, distribution transformer, switch or recloser, mile of overhead conductor, mile of underground cable, and meter – together with the source data and the budget-to-actual variance.

OCC-790. Summed across 2017 through 2025, Exhibit CLP-ADDITIONS-3 shows annual programs and annual work orders of approximately $2,289.8 million of the net distribution plant additions. For each annual program and annual work order, provide the authorization documentation required under the Project Authorization Policies at Exhibits CLP-ADDITIONS-10A and 10B, or, if no project-level authorization was required, identify the approval governing the annual amount and the policy provision permitting it.

OCC-791. State whether the "Pre-Construction Estimated Costs" column in Exhibit CLP-ADDITIONS-4 reflects the estimate at initial Project Authorization Form approval or as revised by a Supplemental Authorization Form, as described at p. 18 and 32–33 of Exhibit CLP-ADDITIONS-1. Where an estimate was revised, provide the original and revised figures and the date of each revision.

OCC-792. Refer Exhibit CLP-TSP-1, p. 60, "the Benefit Cost Analysis (BCA) tool is utilized to determine the most cost-effective reliability improvement work to perform based on historical event data to meet a desired reliability outcome." State the date the tool was first used to select distribution reliability work, provide its ranked candidate list and the work performed for each year it was used, and explain each case in which lower-ranked work proceeded.

OCC-793. Refer to Exhibit CLP-ADDITIONS-1, p. 45. Approximately $4.3 billion of capital additions has been placed in service since January 1, 2017. Identify all such additions retired, abandoned or written off before the end of their depreciable life, with the in-service and retirement dates, the original cost, the amount remaining in rate base, and the reason.

OCC-794. Refer to Exhibit CLP-ADDITIONS-4 reports projects and programs whose actual cost exceeds the pre-construction estimate by more than 25 percent, a number of which carry no entry in the Project Notes / Variance Explanations column. Identify each such project, and for each provide the variance explanation and the supplemental authorization, or state the policy provision under which no supplemental authorization was required.

OCC-795. Refer to Exhibit CLP-ADDITIONS-12. Planned Reliability capital falls 41 percent, from $209.4 million for 2023 at page 121 of to $123.4 million for 2025 at page 167, and the 2025 book gives the reason as regulatory recovery risk. Exhibit CLP-TSP-1 at page 42 describes approximately $667.3 million in 2027 as the baseline investment necessary to maintain existing reliability levels. State:

a. Whether the 2025 planned amount was below the level the Company considered necessary to maintain reliability at the time the plan was set

b. If so, the shortfall in dollars and the work deferred, and

c. The reliability effect of that deferral in SAIDI, SAIFI and customer interruptions.

OCC-796. On the Annual Projects Pre 2022 tab of Exhibit CLP-ADDITIONS-4, the 2017 and 2019 Line Reliability annual programs report actual cost 231.89 percent and 233.24 percent above estimate (lines 53 and 95), and the 2019 Emergent Line annual program reports 51.87 percent above estimate (line 90). For each, state how the estimate was set, explain the variance, and how the overrun was authorized.

OCC-797. Refer to Exhibit CLP-ADDITIONS-12 shows planned transformer purchases rising from $27 million in the 2019 plan (p. 44) to $40 million in the 2025 plan (p. 166). For each year 2017 through 2025, state the number of distribution transformers

purchased, installed, and held in inventory at year end, the average unit price paid, and the number installed to replace failed units as distinct from those serving new load.

OCC-798. Exhibit CLP-ADDITIONS-12 shows planned underground residential direct buried cable work declining from $43 million in the 2020 plan (p. 64) to $28 million in the 2025 plan (p. 166). State the total circuit miles of direct buried cable on the system, the miles replaced in each year 2017 through 2025, the cost per mile realized, the miles remaining at December 31, 2025, and the failure rate of the replaced and remaining populations.

OCC-799. Refer to Exhibit CLP-ADDITIONS-1 at p 13. Please provide the results of the condition assessments described in the Planning Process section for distribution poles, overhead conductor, underground cable, network equipment and substation transformers, showing units inspected, units assessed as deficient, units replaced, and units carried forward.

OCC-800. State the criteria the Company applies in deciding whether an asset is replaced, repaired, or left in service, and provide the written standard with the effective date of each version in force between 2017 and 2025.

OCC-801. For each year 2017 through 2025, state the number and installed cost of assets replaced under the annual programs in Exhibit CLP-ADDITIONS-4 that had not been assessed as deficient at the time of replacement, and the basis on which those replacements were made.

OCC-802. System resiliency and expanded reliability are reported in Exhibit CLP-ADDITIONS-12 at $30 million (page 82), $38 million (page 101), $58 million (page 120), $61 million (page 144) and $26 million (page 166). Disaggregate each amount by program and provide, per program and year, the units installed, replaced or removed, the unit cost, and the reliability benefit measured after completion.

OCC-803. For each project or program classified as Reliability, Network Reliability or Expanded Reliability in Exhibit CLP-ADDITIONS-1 during 2017 through 2025, identify the circuit, substation or device affected and provide SAIDI, SAIFI and customer interruptions for that circuit for the three years before and the three years after the in-service date.

OCC-804. Refer to Exhibit CLP-TSP-1, p. 76. Table 1 reports Blue-Sky SAIDI of 70.7 minutes in 2021 and 77.5 minutes in 2025. Reconcile that performance with the

reliability capital placed in service over the same period, and state the reliability performance the Company expected to achieve from that investment as documented at the time of authorization.

OCC-805. Refer to Exhibit CLP-ADDITIONS-12, p. 145. Company attributes the 2024 decrease in Peak Load/Capacity to "large Substation capacity projects (6 in 2023 versus 3 in 2024)." Identify each substation capacity project undertaken during 2017 through 2025, with the load forecast and planning criterion relied upon at authorization, the measured peak load in the five years after in-service, the total cost, and any non-wires alternative evaluation.

OCC-806. Refer to Exhibit CLP-TSP-1 at p. 39 to 71, section IV – Roadmap of the 5-Year TSP plan. State whether any asset placed in service during 2017 through 2025 and included in the recovery request at page 45 of Exhibit CLP-ADDITIONS-1 is scheduled for replacement, upgrade or removal under that plan, with the amount in rate base, the remaining book life, and the reason.

OCC-807. Refer to Exhibit CLP-TSP-3, at p. 7. The Company states that the Sustained tier maintains current reliability at minus 0.7 minutes of SAIDI, and that the Targeted System Performance tier improves performance by 6.1 minutes. Provide the calculation that produces the 6.1 minutes, identify the programs credited with the improvement, and state the SAIDI benefit assigned to each.

OCC-808. Refer to Exhibit CLP-TSP-3, at p. 7. There are no dedicated resiliency investment in the Sustained tier. Exhibit CLP-ADDITIONS-12 records system resiliency and expanded reliability spending in every year from 2019 through 2025, covering right-of-way lines, pole integrity, smart switches and substation security. Identify the storm resiliency work in the Targeted System Performance tier that was not already performed under those programs.

OCC-809. Refer to Exhibit CLP-TSP-3, at p. 8. The Company shows the Targeted System Performance tier adding $374 million over five years above the Sustained tier, described as Enhanced Reliability, Asset Health and Resiliency Programs. Identify every program funded by that $374 million, with the amount and year for each, and state what each delivers that the Sustained tier does not.

OCC-810. Refer to Exhibit CLP-TSP-3, at p. 11. In the table,

a. The Targeted System Performance column is blank for Substation Capacity, DER Enablement, Substation Transformer Replacements per Year, Average Fleet

Age in 2040, and Oldest Unit in 2040. Provide the value for each of those rows under the Targeted System Performance tier.

b. The Sustained tier and the Targeted System Performance tier both expecting one transformer failure per year starting in 2030, both showing Grid Mod average annual impact of $14 million, and both showing vegetation management of $91 million per year starting in 2028. State what the incremental $374 million changes in each of those three measures.

OCC-811. For New Customer, Peak Load and Capacity, and substation transformer replacement, provide the five-year amount in each of the three tiers shown at page 7 of Exhibit CLP-TSP-3. For each category, state the amount already placed in service during 2017 through 2025 as recorded in Exhibit CLP-ADDITIONS-12, and what remains to be built.

OCC-812. Refer to Exhibit CLP-TSP-1 at 49.

a. Provide hourly load forecast in MW and MWh for next 10 years for each proposed capacity project.

b. Provide the contingency standard applied to the proposed stations including the normal and emergency ratings at feeder and substation level.

OCC-813. Refer to Exhibit CLP-TSP-1 at 49. List all projects included in both New Customer Load and Peak Load/Capacity categories. For each individual project, include:

a. A summary of the project scope, including the existing conditions and proposed solution.

i. A breakdown of project cost, including labor, materials, overhead, and contingency, etc.

ii. The year of the constraint driving the project.

b. The in-service year for the project.

i. State whether NWA solutions were considered for each project, and if so, provide the analysis, including benefit-cost-analysis.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

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CERTIFICATE OF SERVICE

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

Dated at New Britain, Connecticut this 21st day of September, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court