Date Filed: October 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

With respect to the statement in each December 2024 Final Accounting Report that, because FERC Form 556 was submitted, the "CIAC Fee is being refunded in full for this final accounting": (a) identify the written policy providing for that treatment and produce it, or state that none exists and describe the practice and its origin; (b) identify each interconnection project from 2017 through the present for which a CIAC fee or percentage CIAC was collected from a customer that had submitted, or later submitted, FERC Form 556, stating the amount collected, the date collected, the date refunded, and the amount still held; and (c) state why percentage CIAC amounts are collected at the outset from qualifying facilities whose Form 556 certification is on file, rather than not being charged at all, and identify who established that practice.

Response:

CL&P objects to this request on the ground that it is an improper effort by ALLCO to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.