Date Filed: October 05, 2026

Witness: Counsel
Request from: ALLCO

Question:

Identify every request from 2017 through the present by any interconnecting customer — including but not limited to Allco and its affiliates — for invoices, general ledger detail, work-order records, or other transaction-level substantiation of interconnection charges, and for each: state the date, the requester (by anonymized identifier for non-Allco customers), the substance of the request, and the Company's response, including whether the requested records were produced, produced in part, or not produced, and who decided the response. State affirmatively whether the construction work-order records required by 18 C.F.R. Part 101, Electric Plant Instruction 4(C), exist for the Fisk, Plainfield, Voluntown, and Bilton project clusters, and, if the Company contends any do not exist, explain why not.

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.