Date Filed: October 05, 2026

Witness: Warren R. Boutin
Request from: ALLCO

Question:

Identify every complaint, dispute, objection, inquiry, or challenge made by any interconnecting customer or developer other than Allco, from 2017 through the present, concerning: (a) percentage overhead or CIAC charges on interconnection costs; (b) differences between estimated and actual interconnection costs; (c) delays in final accounting, reconciliation, or refund payment; or (d) requests for invoices, general ledger detail, or other substantiation of interconnection charges. For each, state the date, an anonymized identifier for the customer, the subject matter, how it was received (correspondence, ombudsperson or customer-advocate channel, regulatory proceeding, or litigation), and its resolution, and identify each Authority docket or court proceeding in which any such matter was raised. If the Company maintains that no such complaint or dispute has ever been made by any other customer, state so affirmatively.

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.

Without waiving said objection, please refer to the Company's response to ICC-019[i], and ALLCO-019[ii].

Prior Referenced Responses:

[i] ICC-019 Question:

Provide in a chart, separated by year: 1) the number of formal interconnection disputes initiated, 2) the number of formal interconnection disputes that required mediation, 3) the number of formal interconnection disputes that required PURA adjudication.

ICC-019 Response:

A "formal interconnection dispute" is any dispute authorized to be adjudicated by PURA pursuant to the Interconnection Guidelines ("Guidelines"); specifically, Section 5.2 of the Guidelines authorizes PURA to adjudicate disputes related to: (1) one or both of the parties' compliance with specified timelines set forth in the Guidelines and

in the Interconnection Agreement; and (2) any EDC interconnection requirement disputed by the customer. The Company does not interpret the term "formal interconnection dispute" to include: (1) any dispute that PURA is not authorized by statute to adjudicate, such as a claim for breach of the Interconnection Agreement; and (2) any dispute that does not follow the formal dispute resolution process set forth in the Guidelines.

Since January of 2020, while there have been instances of customers reaching out to PURA EOE to help resolve an issue between CL&P and the customer, there have been no formal interconnection disputes initiated and, consequently, there has been no mediation or adjudication of such disputes. Section 21.1 of the PURA-approved form of Interconnection Agreement requires that the parties attempt to resolve all disputes promptly, equitably and in good faith prior to following the dispute resolution process in the Guidelines. The Company works with customers to resolve any disputes prior to the potential initiation of a formal interconnection dispute.

[ii] ALLCO-019 Question:

With respect to the injuries and damages expense, judgments and settlements, and outside legal expense that are the subject of OCC-303, OCC-308, and OCC-309, identify the portion of each that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers (including disputes with Allco or its affiliates), stating the amount, FERC account, and matter; and state whether the Company proposes to recover through rates any judgment, settlement, refund, or interest obligation arising from such disputes.

ALLCO-019 Response:

With respect to the Company's response to OCC-303, CL&P does not track injuries and damages expense in a format that would allow the Company to identify the portion of expense that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers.

With respect to the Company's response to OCC-308, there are no judgments and/or settlements resulting from lawsuits brought by distributed generation developers, qualifying facilities, or interconnection customers.

With respect to the Company's responses to OCC-309, CL&P does not track legal expense in a format that would allow the Company to identify the portion of expense that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers.