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August 7, 2026

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: Docket No. 26-05-10, Application of CL&P d/b/a Eversource Energy to Amend its Rate Schedules

Dear Mr. Gaudiosi:

The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or the "Company") respectfully submits this response to the joint correspondence filed on August 5, 2026, in this docket, by the Office of Consumer Counsel ("OCC") and the Public Utilities Regulatory Authority ("PURA") Office of Education, Outreach, and Enforcement ("EOE") (together, "OCC/EOE") (the "August 5th Letter").

In the August 5th Letter, OCC/EOE assert that Eversource's Application "may be incomplete" due to a lack of "required" materials. Specifically, they claim that the Application may be incomplete for two reasons: (1) it does not clearly indicate whether Eversource seeks recovery of all 2025 storm costs, and, if so, is missing the necessary supporting documentation; and (2) the Company has not yet posted redacted versions of certain confidential documents on PURA's website. OCC/EOE further claim that allowing Eversource to file these materials after the Application's acceptance would impede their ability to conduct a meaningful review within the 350-day statutory timeframe.

As discussed below, PURA should reject OCC/EOE's claims because they lack any legal foundation or reasonable factual basis. OCC/EOE are attempting to impose standards of their own creation, elevating their administrative preferences to "filing requirements" without support from statute, PURA regulations, or prior PURA decisions.

1. **The Application Expressly States that the Company Is Seeking Recovery of Catastrophic Storms from January 1, 2024 through March 31, 2025.**

The Company's Application clearly states that it seeks to recover the costs it prudently

incurred to restore power following catastrophic events in 2024 and through March 31, 2025.[1] Nevertheless, OCC/EOE claim that because Exhibit CLP-REVREQ-2, Workpaper C-3.26 references "Actual Costs" for calendar year 2025 and incorporates those costs (along with storm costs from other years) into the calculation of the requested storm reserve funding, it is ambiguous whether the Company's requested recovery includes all catastrophic events occurring in 2025. This claim is baseless.

The Company included calendar year 2025 storm costs in Exhibit CLP-REVREQ-2 for the purpose of illustrating recent levels of storm-related expenses. However, the post-March 31, 2025 costs shown in that schedule are not the basis of the Company's request for cost recovery and are not used to calculate or justify the requested recovery for catastrophic storms in this proceeding. The Company's request is limited to the qualifying 2024 storm events and 2025 storm events through March 31, 2025, as expressly stated in the above-cited portions of the Application.

2. The Application Is Complete Because PURA and OCC Received 100% of the Referenced Confidential Documents on the Date the Application Was Filed.

In response to OCC/EOE's claim that "the Application still lacks the public filing of many components, as noted in Motion No. 9 and [PURA's] Ruling," it is important to note that PURA's July 28, 2026 ruling on Motion No. 9 states, "the Authority will establish a filing deadline for the redacted versions of the Company's confidential bulk filings after hearing from the Company, non-Company parties, and intervenors at the scheduling conference."[2]

However, OCC/EOE have not identified any statute, regulation, PURA precedent, or rate case standard filing requirement (SFR) that would deem an application "incomplete" solely because redacted versions of confidential documents are submitted after the initial filing. The confidential versions of the applicable documents were timely provided to the parties as part of the initial July 14, 2026 Application, ensuring there was no delay in access to the information subject to redaction.

In addition, until recently, PURA's precedent recognized that "bulk" documents containing confidential information could be filed confidentially in their entirety.[3] Prior PURA rulings

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[1] (See, e.g., Exhs. CLP-REVREQ-1, at 10-13; CLP-STORM-ACCT-1 (Summary); CLP-STORMS-IMT-1 (details for 2024 storm events and 2025 events through March); CLP-STORM-1 (testimony concerning cost accounting and documentation for 14 catastrophic events between January 2024 and March 2025); CLP-ELP-1, at 6 ("The total revenue deficiency in the Rate Year, inclusive of the impact of the 2018 through March 2025 storms, is approximately $727 million."); id. at 139 ("In this proceeding, the Company has presented storm prudency documentation associated with storms and pre-staging events that occurred during 2024 and in February and March, 2025, for a total cost of $157.270 million); CLP-STORM-IMT-2; CLP-STORM-IMT-3)).

[2] Docket No. 26-05-10, Jul. 28, 2026 Ruling on Motion No. 9.

[3] See, e.g., Docket No. 25-12-13, Application of the Connecticut Light and Power Company d/b/a Eversource Energy for Order to Securitize 2018-2023 Catastrophic Storm Costs (April 2, 2026 Ruling on Motion No. 36) (allowing protected bulk confidential documentation to be provided in a folder and subfolder structure without a public redacted filing version); Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (March 26, 2025 Letter Ruling on Motion No. 59) (finding that the Company was not required to publicly file redacted versions of bulk confidential documents).

authorizing this practice were issued as recently as 2025 and 2026. Thus, PURA proceedings have previously moved forward without requiring redacted versions of the same types of documents. The claim that the Company's filing is now "incomplete" due to the absence of redacted versions is therefore unfounded. PURA's July 10, 2026 procedural order, issued just four days before the Company's Application, announced a change in policy regarding bulk redactions but did not state that filings would be considered incomplete without the immediate filing of redacted versions. On the contrary, the order contemplated that confidential materials *could still be submitted* on a confidential basis, subject to a motion requesting permission to file *only* a confidential version without a redacted counterpart, something the Company has not pursued. Instead, the Company has simply requested a reasonable amount of time to comply with PURA's direction to prepare redacted versions. During this interim period, no party's interests are prejudiced by the separation in time between the filing of the confidential copy and the redacted copy.

On July 10, 2026, PURA issued a Procedural Order clarifying that, "[a]s a general rule, parties and intervenors may not submit bulk filings confidentially without a redacted version submitted publicly." PURA further explained that a party seeking to file bulk documents ***only*** confidentially must demonstrate "extraordinary circumstances" and that "[s]heer volume is not a sufficient basis for submitting bulk filings only confidentially, without submitting a public version." (emphasis added).

In a demonstration of good faith and compliance with PURA's ruling, the Company responded promptly to PURA's Procedural Order. On July 14, 2026, CL&P filed Motion No. 9, proposing a Redaction Schedule to address the requirements of PURA's July 10th Procedural Order. On July 28, 2026, PURA ruled on Motion No. 9 and stated that it would set the date for the scheduling conference. Until PURA issued its July 10th Procedural Order and established an implementation process, the Company could not have known what level of public redaction PURA would require. PURA has now established that process and scheduled the matter for resolution at the August 11, 2026 scheduling conference. In the meantime, CL&P continues to work diligently and in good faith to comply with PURA's direction to file public, redacted versions of the confidential documents. For these reasons, EOE/OCC's effort to characterize this procedural matter as a deficiency in the completeness of the Company's Application is unfounded and should be rejected.

In considering OCC/EOE's claim, PURA should recognize that the Company timely filed 100 percent of the applicable confidential documents on July 14, 2026, the date the Application was filed. PURA, EOE and OCC are in possession of these documents. In addition, the Company has committed to reasonably accommodate any party or intervenor that requests a redacted version of a confidential document through an interrogatory prior to the completion of the bulk redaction process. Accordingly, there is no factual or legal basis to conclude that the Company's Application is "incomplete."

Lastly, adopting the standards advocated by OCC and EOE would render nearly every rate case application "incomplete," as there will almost always be some issue a party could claim, from their perspective, was omitted from the initial filing. This is not how the statutory and regulatory framework operate for rate-amendment filings. Pursuant to law and regulation, it is the Applicant

who determines the components of its filing, subject to PURA's review under its established regulations.

Specifically, R.C.S.A. § 16-1-45 states:

> Petitions and applications shall include all forms of proposals, requests, applications, petitions, and filings of whatever nature whatsoever ***that are placed before this Authority*** pursuant to law.

(emphasis added).

R.C.S.A. § 16-1-46(b) states:

> (b) Annexed materials. There shall be attached to the petition or application any exhibits, sworn written testimony, data, models, illustrations and all other materials ***that the petitioner or applicant deems necessary or desirable to support the granting of the petition or application.*** In addition, such annexed materials shall also include such exhibits, sworn written testimony, and other data that ***any statute or these rules may require***.

(emphasis added).

Most important, R.C.S.A. § 16-1-49 states:

> ***Where these rules require*** that specific exhibits or data be prepared and submitted as part of any petition or application, the Authority may within thirty (30) days of the filing thereof, ***after notice and an opportunity to be heard*****,** reject any petition or application or any portion of an application or petition that the Authority finds to have failed to comply with criteria for submission of exhibits and data ***as are set forth in these rules***. If in response to and within thirty (30) days of the filing of a petition or application the Authority requests additional supporting exhibits or data, ***such exhibits or data shall be furnished within a reasonable time.*** For purposes of this provision, thirty (30) days from the date of the request shall be considered a reasonable time except where the data and exhibits requested are unusually complex or, in the aggregate, unusually voluminous. ***Failure to substantially comply with such request*** may be considered grounds ***for rejecting the application*** or petition or any portion of the application or petition to which such data or exhibits relate, after notice and an opportunity to be heard, notwithstanding that the date of rejection may under such circumstances be more than thirty (30) days after receipt of the petition or application.

(emphasis added).

The Company has fully complied with all PURA directives related to its filing. OCC/EOE's attempt to characterize the Application as deficient and "incomplete" is without merit. Under applicable law and regulation, the Company's filing is complete.

3. Conclusion

Eversource appreciates the opportunity to respond to the OCC/EOE claims. The Company remains committed to engaging with other parties to answer questions and resolve issues before making filings with PURA. We look forward to addressing any additional procedural questions at the August 11, 2026 Scheduling Conference.

Very truly yours,

Vincent P. Pace

Vincent P. Pace
Assistant General Counsel
On behalf of Connecticut Light and Power Company d/b/a Eversource Energy

cc: Service list