Date Filed: October 13, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray and Sasha P. Lazor
Request from: Public Utilities Regulatory Authority

Question:

(RATE PROCEEDING SALARIES) Application, Sch. C-3.5; Interrog. Resp. OCC-199; Public Act 23-102, Sec. 2. Regarding employee salaries associated with attendance in, participation in, preparation for, or appeal of a rate proceeding:

a. Provide the total charges to work order CT260N11 and to each other work order, cost center or account used to record labor associated with this proceeding. Show by month, by employee classification, and by hours and dollars.
b. State whether any portion of those amounts is included in the payroll expense in Schedule C-3.5 for the Test Year or Rate Year. Identify the line on which it appears and the amount.
c. Identify the EESCO services listed in Attachment 1 of the response to Interrogatory EOE-066 under the captions Legal and Regulation that relate to regulatory proceedings and appeals. State the amount charged to CL&P in the Test Year and Rate Year and the amount removed as non-recoverable.
d. State the EESCO labor charged to work order PURAAN11 identified in Attachment 1 of the response to Interrogatory OCC-355 as established for employees supporting the Connecticut Management Audit in each calendar year from 2021 through 2025. State whether any portion of the charge is included in Schedule C-3.5 or Schedule C-3.11 while management audit cost is treated as a deferred expense in Exhibit CLP-REVREQ-11.

Response:

a. Please refer to RRU-070, Attachment 1, for the total internal labor charges to work order CT260N11 by month, employee classification, hours and dollars.

b. As outlined within Exhibit CLP-REVREQ-9, all rate case expenses requested for recovery in the Rate Year are from external vendors/contractors. There are no internal payroll, labor or benefits costs included within the $3.1 million rate case expense outlined in Exhibit CLP-REVREQ-9. Please note that the Company does not incur incremental payroll, labor or benefits costs when preparing, filing or adjudicating a rate case. All internal labor associated with this proceeding is staffed with current employees that work for the Company on a permanent basis, which means that there is no additional internal cost caused by the rate case. The Company's departments handling the rate case are the Connecticut revenue requirements group; the Connecticut rates group; and the internal legal department. The Test Year for this case is fiscal year ending December 31, 2025, and the

internal work on the rate case is exclusively contained in fiscal year 2026, and the Company has confirmed that there is less than $10,000 recorded in 2025 in relation to the rate case. Please refer to the Company's response to OCC-332[i], for a detailed explanation as to how the Company calculates its Test Year pro-forma and Rate Year payroll expense. Applying the Company's calculation of payroll expense, there are no payroll, labor or benefit costs pertaining to the rate case in the proposed revenue requirement.

c. All of the costs identified in RRU-070, Attachment 1, are direct charged from the Service Company and represent non-incremental charges (see response part b.). The Company does not track the Service Company costs recorded to work order CT260N11 based on each category identified in EOE-066, Attachment 1.

d. Please see Table 1 below for the total EESCO internal labor charges to work order PURAAN11 for each of the years 2021 through 2025. There are no internal payroll, labor or benefits costs included within the $901,194 expense outlined in Exhibit CLP-REVREQ-11. As shown in Exhibit CLP-REVREQ-11, the only Management Audit costs deferred and sought for recovery in this case are incremental costs billed to the Company by PURA for professional services provided by FTI Consulting, Inc. Consistent with the Company's response to part b. above, the Company does not incur incremental payroll, labor or benefits costs when participating in a PURA Management Audit. All internal labor associated with that work effort is staffed with current employees that work for the Company on a permanent basis, which means that there is no additional internal cost caused by the Management Audit.

Table 1
EESCO Labor Charged to PURAAN11
Calendar Years 2021 – 2025

Year	**Amount**
2021	$20,446
2022	$72,075
2023	$107,932
2024	$1,069
2025	$236
Total	**$201,800**

Prior Referenced Response:

[i] OCC-332 Question:

Payroll. State whether the Company used the same forecasting methodology used in the prior rate case. If not, explain in detail all changes.

OCC-332 Response:

Yes. The Company utilized a similar methodology that was used in the prior CL&P rate case in Docket No. 17-10-46 which was also the methodology used in the last Yankee Gas rate case in Docket No. 24-12-01 to calculate the Test Year Pro-Forma ("TYPF") payroll expense as well as the Rate Year payroll expense.

The Company's Test Year payroll data consists of hundreds of thousands of lines of individual transactions that are unique each and every year. Those transactions can vary based on a number of different conditions throughout the year such as weather events, supply chain issues, personnel availability, capital budgets and much more. To determine the normalized Test Year level of payroll expense, the Company performs an independent evaluation of the payroll expense utilizing actual employee salary information as of the end of the Test Year as described in greater detail below and supported by detailed calculations provided as attachments to this response.

(1) In order to calculate the TYPF level of payroll expense, the Company first begins with a listing of actual CL&P and Eversource Energy Service Company ("Service Company") salaries for each employee position that is **filled and active** as of December 31, 2025. It is important to begin with only those positions that are filled and active as those are the positions the Company is experiencing actual expenses for. This also ensures that an imputed vacancy rate is accounted for as the Company typically does not have 100% filled and active positions at any single point in time and therefore it would be inappropriate to include all positions (inclusive of unfilled and inactive positions) in the TYPF calculation. Please refer to OCC-332, Attachment 1, for the full listing of CL&P and Service Company employee salaries as of December 31, 2025.

(2) In a normal year it is expected that CL&P employees will charge 100% of their time to CL&P and therefore the amounts shown on OCC-332, Attachment 1, page 1, lines 6 through 10, support the TYPF amounts shown on Exhibit CLP-REVREQ-2, Work Paper C-3.5, page 1, lines 15 through 19. In a normal year it is typical for Service Company employees to charge their time to multiple operating companies throughout the year, and therefore the Company takes the total Service Company salaries shown in OCC-332, Attachment 1, page 38, lines 6 through 16, and allocates those costs to CL&P. In order to do so, the Company utilized the actual labor charged to CL&P by each Source Cost Center ("SCC") and compared that to the total actual labor charges for each of the same SCCs. Please see OCC-332, Attachment 2, for the calculation of the amount of Service Company salaries allocated to CL&P and OCC-332, Attachment 3, for the actual 2025 allocation of labor by SCC utilized in the calculation in OCC-332, Attachment 2. The allocated amounts shown in OCC-332, Attachment 2, page 1, lines 8 through 18, support the amounts shown in Exhibit CLP-REVREQ-2, Work Paper C-3.5, page 1, lines 33 through 42.

(3) The base salaries calculated in items (1) and (2) above are total salaries prior to the split between capital and O&M; therefore, the final necessary adjustment to those CL&P allocated salary amounts is to account for the portion that will be capitalized, which is then removed from the payroll expense schedule. In order to do so, the Company utilized the actual Test Year capitalization ratios. Please see OCC-332, Attachment 4, for the calculation of the Test Year capitalization percentages.

In summary, the Company starts by taking actual salaries of active / filled positions as of December 31, 2025, and allocates those to CL&P and further assigns a portion to expense and capital all based on actual Test Year information. That resulting TYPF payroll expense becomes the basis for payroll expense increases utilizing annual merit adjustments. The difference between the TYPF amount above and the actual Test Year expense results in the $2.778 million pro-forma increase (or approximately 2%).

In addition, the Company is proposing incremental Full Time Equivalents ("FTEs") in Exhibit CLP-REVREQ-2, page 3 of 3. Page 3 of 3 shows the number of employees the Company expects to hire in each business area (i.e. Vegetation Management, Grid Modernization, Engineering Capital, Distribution System Planning, Asset Health and Field Engineering). It also shows the expected salary, hiring date, and resulting O&M payroll expense included in the Company's COS. This treatment is consistent with the Company's incremental FTE request in Docket No. 17-10-46.