Date Filed: October 13, 2026

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

Question:

(CORPORATE COMMUNICATIONS) O'Brien and Murray Pre-Filed Test., pp. 80-81; Application, Sch. WP C-3.9; Interrog. Resp. EOE-066, and Interrog. Resp. OCC-310; Public Act 23-102, Sec. 3(c). Regarding the corporate communication expense:

a. Provide an itemization of the media relations and other communication expenses of $244,000 in the Test Year and $141,000 in the Rate Year by activity, vendor, purpose, date, medium and subject matter. State for each item whether it constitutes a mandated bill insert or safety messaging, and whether it relates to rate proceedings, regulatory matters, legislation or the Company's financial performance. If neither a mandated bill insert nor safety messaging, identify the provision of Public Act 23-102 permitting recovery.
b. Explain the negative Test Year amount of $28,000 for mandated bill inserts. Identify each credit or reversal producing it and state whether it is non-recurring.
c. Reconcile the response to Interrogatory OCC-310, which states that all public relations expenses are recorded below the line, to the media relations expense retained in Schedule C-3.9.
d. Identify the EESCO communications services described in Attachment 1 of response to Interrogatory EOE-066 as executive communications, media relations and regulatory communications. State the EESCO cost recorded under each in the Test Year, the amount allocated to CL&P, and the schedule and line on which it is included in the application.

Response:

a. As an initial matter the language in Public Act 23-102 states, "No public service company shall recover through rates any direct or indirect cost associated with advertising, marketing, communications **that seek to influence public opinion** or any other related costs identified by the authority, unless such marketing, advertising, communications or related costs are specifically approved or ordered by the authority or the Department of Energy and Environmental Protection." (emphasis added) There are no communication expenses in the Corporate Communications Schedule "that seek to influence public opinion."

   Further, in the Company's response to OCC-261[i], the Company defines advertising as "political," "institutional" or "promotional" advertising, which General Statutes Section 16-19d(a) defines as follows:

- "Political advertising" means "any advertising for the purpose of influencing public opinion with respect to any legislative, administrative or electoral decision or with respect to any controversial issue of public importance."

- "Institutional advertising" means "any advertising which is designed to create, enhance or sustain a public service company's image or good will with regard to the general public or its customers."

- "Promotional advertising" means "any advertising that has the purpose of inducing the public to select or use the service or additional service of a public service company or select or install any appliance or equipment designed to use such service, provided such advertising shall not include advertising authorized by order or regulation of the Public Utilities Regulatory Authority."

The Company has not included any costs associated with advertising, marketing or communications "that seek to influence public opinion" in the Corporate Communications schedule or any other schedule in the cost of service. Those costs that the Company incurs related to this are properly booked below the line and paid for by the Company. Please refer to RRU-074, Attachment 1, for a detailed listing of the costs included in Media Relations and Other Communication Expenses for the Test Year and Rate Year. In preparing this response, the Company identified an approximately $5,000 downward adjustment to the Test Year Pro Forma amount that was included in the Rate Year and will reflect this adjustment in the next cost of service update.

b. The negative (credit) Test Year amount of ($28,000) for Mandated Bill Inserts is related to Allied Printing invoices that were recorded on the General Ledger prior to 2025 and then subsequently canceled in 2025, resulting in non-recurring credits in the Test Year. Please refer to RRU-074, Attachment 2, for additional detail.

c. The Company's interpretation of "public relations" in the context of OCC-310[ii] is based upon the specific language in Public Act 23-102 relating to costs "that seek to influence public opinion." As stated in the Company's response to subpart (a.), the Company has not included any costs in the Corporate Communications schedule or any other schedule in the cost of service "that seek to influence public opinion."

d. The Company reviewed the accounting work orders included in the Corporate Communication Schedule and included the costs associated with media relations work orders in RRU-074, Attachment 3. The Company did not have any accounting work orders

identified as executive communications and regulatory communications in the 2025 Test Year.

Prior Referenced Responses:

[i] OCC-261 Question:

(Advertising Expense) Please provide the total advertising expense (direct and allocated) by program for each of the years 2021, 2022, 2023, 2024, 2025, and the amount included in the Rate Year.

OCC-261 Response

The Company interprets this question to be asking about "political," "institutional" or "promotional" advertising, which General Statutes Section 16-19d(a) defines as follows:

- "Political advertising" means "any advertising for the purpose of influencing public opinion with respect to any legislative, administrative or electoral decision or with respect to any controversial issue of public importance."
- "Institutional advertising" means "any advertising which is designed to create, enhance or sustain a public service company's image or good will with regard to the general public or its customers."
- "Promotional advertising" means "any advertising that has the purpose of inducing the public to select or use the service or additional service of a public service company or select or install any appliance or equipment designed to use such service, provided such advertising shall not include advertising authorized by order or regulation of the Public Utilities Regulatory Authority."

The Company has not incurred political, institutional, or promotional advertising expenses in any of the time periods reflected.

[ii] OCC-310 Question:

Lobbying/Public Advocacy Costs/Government Relations/Public Relations Expenses.

a. Please identify all lobbying/public advocacy costs/government and/or public relations expenses (direct and allocated) by category included in above-the line accounts in each of the years 2021, 2022, 2023, 2024, 2025, and the amount included in the Rate Year.
b. Provide a list of all employees (direct and allocated) that participate in lobbying/public advocacy costs/government/public relations activities. For each employee, provide:
    i. Job title
    ii. Total fully loaded compensation and the amounts charged to CL&P (direct and allocated) for each of the years 2021, 2022, 2023, 2024, 2025, and included in the Rate Year and the accounts charged.
    iii. Provide the percent of time spent on lobbying/public advocacy/government relations activities in each of the years in subpart a, the Test Year and expected in the Rate Year.
    iv. All company-paid or reimbursed expenses or allowances (direct and allocated) for each of the years in subpart a and included in the Test Year and Rate Year and the accounts charged.

OCC-310 Response:

a. All lobbying costs, including public advocacy costs, government relations expenses, and/or public relations expenses (including amounts allocated from Eversource Energy Service Company) are charged to FERC accounts that are recorded below-the-line. Therefore, there are no costs in the Test Year and Rate Year.

b. Please refer to the response to part (a), above.