Date Filed: October 06, 2026

Witness: Warren R. Boutin, Leanne M. Landry and Jeffrey D. Turano
Request from: ALLCO

Question:

Identify the agreement or agreements under which Burns & McDonnell performs interconnection-related functions for the Company, and produce each, including statements of work: (a) describe the functions Burns & McDonnell performs — application processing, study administration, cost estimating, account maintenance, final accounting, refund administration, or otherwise; (b) state the basis on which Burns & McDonnell is compensated, and state whether any component of its compensation varies with the amounts estimated, billed, or collected from interconnecting customers; (c) identify, by title, the Burns & McDonnell personnel who perform the final accounting and refund-administration functions and the CL&P or ESC personnel who supervise them; and (d) state whether Burns & McDonnell's costs are recovered through the interconnection overhead loaders, through the approximately $1.257 million annual interconnection program administration cost identified in ALLCO-010, through base rates, or through some combination, and quantify each component for the test year.

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, the Company states as follows:

a. The functions performed by Burns and McDonnell are related to Construction Project Management and Analysis that support the Project Manager.

b. Burns and McDonnell employees charge their time to individual work orders. The charges are applied against the customer payments. The compensation does not vary with the amounts estimated, billed or collected from interconnecting customers.

c. The employees performing this work include DER Construction Project Management and Analysts.

d. The Burns & McDonnell costs are not recovered through the approximately $1.257 million annual interconnection program administration costs identified in ALLCO-010[i], as stated in the Company's response to ALLCO-055[ii].

Prior Referenced Response:

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[i] ALLCO-010 Question:

State the Test Year and projected Rate Year costs of administering the Company's Connecticut distributed generation interconnection program (including employee and contractor headcount and costs, and any allocations from Eversource Energy Service Company or from Burns & McDonnell or other third-party project management vendors), and identify where those costs appear in the proposed revenue requirement.

ALLCO-010 Response:

Please refer to the table below which shows the Test Year and projected Rate Year O&M expenses associated with administering the Company's Connecticut distributed generation interconnection program including employee and contractor costs and where they appear in the Company's cost of service.

Description	Schedule	Test Year	Rate Year
Labor	C-3.5 Payroll	$616,047	$660,100
Outside Services/Other Admin Costs	C-3.16 Field Ops – OH Lines	$640,960	$682,263
Total		**$1,257,007**	**$1,342,362**

[ii] ALLCO-055 Question:

Follow-up to the Company's response to Q-ALLCO-010 (third-party and affiliate interconnection administration costs). The Company's response quantified the labor ($616,047 test year; $660,100 rate year) and outside-services ($640,960 test year; $682,263 rate year) components of its Connecticut DG interconnection program administration costs, but did not respond to the portion of Q-ALLCO-010, concerning amounts paid to, or allocated from, Burns & McDonnell and Eversource Energy Service Company. For the test year and each rate year:

(a) state the total amount paid to Burns & McDonnell (or any successor or affiliated engineering contractor) for services relating to the interconnection of distributed generation in Connecticut, and state whether that amount is included within the $640,960/$682,263 outside-services figures identified in the Company's response;
(b) state the total amount of Eversource Energy Service Company costs allocated to CL&P for services relating to the interconnection of distributed generation in Connecticut, identify the allocation method, and state whether that amount is included within the figures identified in the Company's response; and
(c) if any amount identified in (a) or (b) is not included in those figures, identify the schedule, account, and cost-of-service line item in which it is recovered.

ALLCO-055 Response:

(a) The total amount paid to Burns & McDonnell for services related to the interconnection of distributed generation in Connecticut is $752,873. The amount is not included within the $640,960/$682,263 outside services figures identified in the Company's response to ALLCO-010[i].

(b) Please refer to the table below, for the total amount of Eversource Energy Service Company costs included within the figures identified in the Companies response in ALLCO-010. These costs are directly charged from employees or contractors when supporting CT Electric Distributed Generation.

Description	Schedule	Test Year	Rate Year
Labor	C-3.5 Payroll	$131,390	$139,391
Outside Services/Other Admin Costs	C-3.16 Field Ops – OH Lines	$194,935	$207,496
Total		**$326,324**	**$346,887**

(c) The Burns and McDonnell amounts identified in subpart (a), above, are not in the cost of service or rate base; therefore, these amounts are not included in any SFR schedule in the Company's rate case application. These amounts are recorded to FERC Account 186010, and are then billed to customers / counterparties for reimbursable work.