STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**SEPTEMBER 9, 2026**

THE OFFICE OF CONSUMER COUNSEL'S FIFTEENTH SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **September 23 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or

control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-590 through OCC-603 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-590. Refer to Exhibit CLP-TSP-1 at 49. Provide the complete NWA study for every traditional capacity project included in the 2027-2031 plan, including the screening date, need profile, required MW and MWh by hour, deferral period, traditional project cost and timing, avoided-cost calculation, technology assumptions, candidate resources, screening result and reason any project was excluded from further NWA evaluation.

a. For each capacity project, provide DER alternative, demand response alternative, energy efficiency alternative, battery alternative, and traditional wires alternative.

OCC-591. Refer to Exhibit CLP-TSP-1 at 49.

a. Provide all load forecast models supporting each proposed line and substation capacity project.

b. Provide all assumptions for EV, heat pump, solar, storage, C&I load growth, data centers, step loads, and economic development load.

c. Identify any capacity projects that could be deferred by NWA, DERMS, AMI-enabled load management, or targeted demand response.

d. For each proposed capacity project, quantify the forecast overload in MVA, MW, amperes and the number of violating hours in each year.

e. For every project passing or nearly failing NWA screening, provide the full benefit-cost analysis, all sensitivities, evaluation workpapers and comparison of the NWA with load transfer, staged construction and the traditional solution. Quantify the present value of deferral for one, three, five and ten years.

OCC-592. Refer to Exhibit CLP-TSP-1 at 49. State whether the Company evaluated each capacity project using historical forecast accuracy, only committed new-customer loads, and expected weather instead of 90/10 weather. For DER-driven projects, state whether historical DER completion and delay rates were considered. If such analyses were performed, provide them, including the resulting need date and project timing.

OCC-593. Refer to Exhibit CLP-TSP-1 at 49. For each proposed capacity project, provide the annual load forecast at the affected substation and feeder level through 2040. Identify the forecast peak, applicable equipment rating, percentage of rating, forecast year of first exceedance, and all new-customer or DER projects included in the forecast. Provide the data in native, unlocked Excel format.

OCC-594. Refer to Exhibit CLP-TSP-1 at 49. For each proposed substation or feeder capacity project, provide the following information:

a. Traditional upgrade scope and total cost, including labor, materials, overheads, contingency, etc.
b. Study year and forecast year(s).
c. Traditional project's planned in-service date.
d. Earliest feasible NWA deployment year and the final year of the analysis period.
e. Substation, feeder and geographic location of the constraint and potential NWA.
f. For each forecast year, provide:
    i. Maximum capacity exceedance in MW;
    ii. Energy above the applicable equipment rating in MWh;
    iii. Annual increase in the exceedance in MW and MWh;
    iv. Maximum continuous duration of the exceedance in hours;
    v. Number of exceedance events and peak days;
    vi. Whether peak days are consecutive; and
    vii. Applicable normal or contingency equipment rating.
g. Identify the NWA technologies and resource mix evaluated, including the assumed percentage or capacity of battery storage, solar PV, demand response, energy efficiency and other resources.

Provide the information in native, machine-readable format, together with the hourly load forecast and applicable equipment rating used to calculate each annual MW, MWh and duration value.

OCC-595. Refer to Exhibit CLP-TSP-1 at 55. Confirm whether the proposed bulk transformer replacements are proactive replacements rather than replacements of failed transformers. If not confirmed, identify each replacement that is required because of an existing failure, capacity constraint, or mandatory compliance requirement.

OCC-596. Refer to Exhibit CLP-TSP-1 at 55, "…plan to maintain a transformer fleet that does not exceed 70 years of age." Identify every law, regulation, manufacturer requirement, or mandatory engineering standard that requires a substation transformer to be retired at 40 years, 70 years, or any other specified age. If no such requirement exists, please confirm.

a. Provide all existing studies, analyses, and historical data relied upon by the Company to conclude that transformer failure risk increases rapidly as transformers approach or exceed 70 years of age. If the Company has not performed an empirical analysis using its transformer-failure experience, please justify.
b. Provide the Company data and analyses used to establish the transformer age thresholds or replacement criteria in the TSP, including the stated 40-year useful life and increased failure risk near 70 years. Include the age and cause of failure for each Company transformer that failed during the period covered by the analysis. If the criteria are not based on the Company's actual failure experience, identify the source on which they are based.

OCC-597. Refer to Exhibit CLP-TSP-1 at 55. For each proposed proactive replacement, identify whether the Company evaluated continued operation through enhanced inspection, testing, monitoring, maintenance, refurbishment, loading limits, load transfer, or use of a spare transformer. Provide each existing analysis and state whether it found that replacement could be deferred by one, three, or five years. If no deferral or life-extension or alternate analysis was performed, please confirm the reason.

OCC-598. Refer to Exhibit CLP-TSP-3 at 67. Confirm whether Shepaug 13A is approximately 85 years old, has Short-Term and Long-Term Health Index values below 0.5, and is not scheduled for replacement during 2027–2031. Identify each younger transformer scheduled for replacement before Shepaug 13A and provide the specific condition, capacity, safety, or compliance reason supporting that ordering.

OCC-599. Refer to Exhibit CLP-TSP-3 at 22–24.

a. Provide the data underlying the headroom and constrained-area presentations on pages 22–24. For each substation identified as constrained, provide its normal and

emergency rating, five-year historical load and peak load data, available headroom, forecast first year of violation, and proposed project cost.

b. For each constrained substation identified, provide the existing analysis of temporary and permanent load transfers. Identify the receiving substation or feeder, available transfer capacity, MW that could be transferred, required enabling work, estimated cost, and reason any transfer was rejected. Please confirm if no transfer analysis was performed.

c. Provide a summary of each actual substation capacity violation and stranded-load event experienced from 2016 through the present. Identify the substation, date, maximum loading, applicable rating, duration, contingency, customers at risk, customers interrupted, and whether load transfer prevented or reduced an outage.

OCC-600. Refer to Exhibit CLP-TSP-3, at 24. Define "stranded load" as used on page 24, including its unit of measurement and the conditions under which load is classified as stranded.

OCC-601. Refer to Exhibit CLP-TSP-3, at 24. For each year from 2022 through 2026, provide the actual stranded load experienced on the system. For each event, identify the substation, date, stranded MW or MVA, duration, cause, and number of customers whose service could not be restored. If no actual stranded load occurred in a year, please report zero.

OCC-602. Refer to Exhibit CLP-TSP-3. For each proposed capacity project, identify every temporary or permanent load transfer evaluated by the Company. Provide the MW available, estimated cost, implementation time, and whether the transfer was accepted or rejected.

a. State whether any evaluated load transfer could eliminate the forecast overload or defer the proposed project. For each such transfer, provide the amount of overload addressed, the resulting revised need date, and the capital investment that could be deferred.

OCC-603. Refer to Exhibit CLP-TSP-3, at 24, figure 'substation violations -statewide',

a. For each year shown, state the MW represented by the "Risk of Stranded Load" line. Define "risk of stranded load" and explain how it is calculated. Provide all data, assumptions, calculations, and analyses supporting the values in native, machine-readable format with formulas intact.

b. The red line becomes non-zero beginning in 2023. For each value shown from 2023 through the latest historical year, clarify whether it represents actual stranded MW or a modeled estimate of load that could have become stranded. If it

is modeled risk, explain why the graph presents a risk estimate rather than actual stranded-load experience for those years.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 9th day of September, 2026.

By: /s/ Kimberly White
Kimberly White
Commissioner of the Superior Court