STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

September 22, 2026
In reply, please refer to:
Docket No. 26-05-10

Vincent Pace, Esq.
Assistant General Counsel
Eversource Energy Service Company
P.O. Box 270
Hartford, CT 06141

Re: Docket No. 26-05-10 – Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Attorney Pace:

Enclosed are interrogatories numbered **UPA-20 through UPA-48** directed to The Connecticut Light and Power Company d/b/a Eversource Energy (Company) and refers to the Company's request to amend its rate schedules.

The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) in connection with the above-referenced docket and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **October 6, 2026, at 4:00 p.m.** The Authority encourages the submission of responses as soon as they are available rather than delaying until all answers are completed. **Please list each question and answer on the same sheet of paper using a separate sheet for each interrogatory number, and sequentially number the pages of each response (e.g., p. 1 of 5, etc.). At the top of each page, clearly identify the Docket Number, the interrogatory number (including the prefix), the name of the company and the person responsible for the response, and the date of submission.**

Similarly, each Late Filed Exhibit that may be submitted after hearing in this docket shall be sequentially numbered and identified with the Docket Number, Late Filed Exhibit Number, page number, the name of the company and the person responsible for the exhibit, and the date of submission.

If a response to any of the requested information has already been filed in response to another Parties' interrogatory(ies) in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

ELECTRONIC SUBMISSION OF FILINGS

IMPORTANT NOTE: The Authority has indefinitely suspended the paper copy filing requirement. Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to the Electronic Filing webpage for more information, including on confidential materials: Make An Electronic Filing

CONFIDENTIAL DOCUMENTS

No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by emailing the material to Jeff.Gaudiosi@ct.gov with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed electronically.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. §1-200 et. seq. In those exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion must be appended to the Motion. The Authority will rule on the Motion forthwith, and it will give further direction as necessary.

The current service list for this docket is available on the Authority's website located at http://www.dpuc.state.ct.us/DPUCPublicList.NSF.

By the Direction of the Authority,

PUBLIC UTILITIES REGULATORY AUTHORITY



Jeffrey R. Gaudiosi, Esq.
Executive Secretary

Enclosure
cc: Service List

DOCKET NO. 26-05-10
APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES

Interrogatories UPA-020 through UPA-048 are directed individually to The Connecticut Light and Power Company d/b/a Eversource Energy (Company) and refers to the Company's request to amend its rate schedules.

UPA-020 Reference Application, Ex. CLP-IAP-1, pp. 10–16. Identify the specific determinations Eversource asks the Authority to make based on this testimony and distinguish those determinations from policy guidance, advisory conclusions, and issues addressed by other Company witnesses or panels.

UPA-021 Reference Application, Ex. CLP-IAP-1, p. 25. State whether Eversource proposes that the Authority consider the "Three Bs" (Budget, Burden, and Balance) and Investment Calibration Framework as the standard for evaluating affordability in this proceeding. If not, identify the existing Authority affordability standard Eversource believes should continue to govern and explain how Eversource proposes to apply the "Three Bs" and Investment Calibration Framework in conjunction with that standard.

UPA-022 Reference Application, Ex. CLP-IAP-1, p. 25. Identify the evidence Eversource relies upon to conclude that the proposed capital plan is affordable from the customer perspective and quantify the bill or energy-burden impact attributable to the proposed capital investment. Provide all supporting calculations and workpapers.

UPA-023 Reference Application, Ex. CLP-IAP-1, pp. 25–27. Define "investment compression" as used in Ex. CLP-IAP-1 and identify the specific evidence relied upon to conclude that reducing or constraining CL&P's proposed capital investment would result in higher long-term customer costs or diminished system performance.

UPA-024 Reference Application, Ex. CLP-IAP-1, pp. 27–28. Explain how the Authority should determine whether a proposed capital investment is efficient for affordability purposes. Also, provide the following:

a. Identify the specific cost, benefit, performance, or alternative-investment information Eversource recommends that the Authority considers in that evaluation; and
b. explain how that comparison distinguishes an efficient investment from one that is "prudent and effective but not highly efficient."

UPA-025 Reference Application, Ex. CLP-IAP-1, pp. 31–32 and 54. Identify each quantitative threshold, benchmark, or other criterion used to distinguish underinvestment, calibrated investment, and overinvestment under the Investment Calibration Framework. If Eversource establishes no such thresholds or criteria, state so. Explain how the results presented on page 54 of Ex. CLP-IAP-1 to determine where CL&P's proposed capital investment falls within the framework.

UPA-026 Reference Application, Ex. CLP-IAP-1, p. 54. Explain the analytical basis for concluding that CL&P's below-average capital spending reflects a "drift toward under-investment." Identify the specific reliability, asset-condition, performance, or investment-need used to distinguish efficient below-average spending from underinvestment. Provide all supporting calculations and workpapers.

UPA-027 Reference Application, Ex. CLP-IAP-1, pp. 53–54. For each peer-benchmarking or historical-spending metric Eversource relied upon to conclude that CL&P's proposed capital investment is within the calibrated range, explain how the metric supports that conclusion and state whether the metric used to evaluate any proposed investment against a lower-cost alternative.

UPA-028 Reference Application, Ex. CLP-IAP-1, p. 33. Clarify the relationship between the Investment Calibration Framework and the traditional ratemaking principle of gradualism. State whether Eversource intends for the framework to supplement gradualism, incorporate gradualism as one component, or change how the Authority considers gradualism when evaluating capital investment and associated rate impacts.

UPA-029 Reference Application, Ex. CLP-IAP-1, pp. 37–45. For each case study, identify the specific factual condition or indicator that Eversource contends is also present at CL&P and cite the CL&P-specific evidence supporting that comparison.

UPA-030 Reference Application, Ex. CLP-IAP-1, pp. 57–58. For each of the four affirmative affordability measures Eversource identifies (the performance-based multi-year rate plan, economic development rate, optional residential space-heating rate, and Consumer Dividend), state the specific action Eversource recommends that the Authority take in this proceeding. Also, state whether conclusion is that CL&P's proposal is affordable depends on implementation of each measure and, if not, identify which measures Eversource considers necessary to support that conclusion.

UPA-031 Reference Application, Ex. CLP-IAP-1, pp. 56–57. Clarify the role Eversource recommends for peer benchmarking after implementation of a multi-year rate plan. Specifically, state whether Eversource recommends continuing peer benchmarking as an ongoing performance measure, using it periodically for comparative analysis, or relying primarily on CL&P's approved plan and historical performance to measure performance over time.

UPA-032 Reference Application, Ex. CLP-IAP-1, pp. 54–56. Quantify the portion of CL&P's elevated O&M that Eversource attributes to aging assets or constrained capital investment after accounting for labor costs, policy-related expenses, customer-base effects, and accounting differences discussed in the testimony. Provide all supporting calculations and workpapers.

UPA-033 Reference Application, Ex. CLP-IAP-1, pp. 30–31. Explain the role of performance-based regulation in the Investment Calibration Framework. State whether Eversource's framework depends on implementation of a performance-based ratemaking structure to maintain capital investment within the calibrated range and identify any PIMs, metrics, or mechanisms used to evaluate capital investment. If not, identify how the framework maintains investment within the calibrated range absent performance-based regulation.

UPA-034 Reference Application, Ex. CLP-IAP-1, pp. 30–31. Explain the role of performance-based regulation in the Investment Calibration Framework. State whether Eversource considers performance-based regulation necessary to keep capital investment within the calibrated range. If not, identify the specific mechanisms or controls Eversource relies upon to keep capital investment within that range.

UPA-035 (ENVIRONMENTAL SOCIAL GOVERNANCE) See UPA-001. Provide the Company's Energy Efficiency Scoping Studies for each year one was conducted and discuss how these studies are aligned with ASHRAE Level 1 and Level 2 standards.

UPA-036 (OFFICER VARIABLE COMPENSATION—RELATIONSHIP BETWEEN ENTERPRISE, EXECUTIVE, AND EMPLOYEE VARIABLE PAY POOLS) Application, Ex. CLP-EMPLOYEE-1, pp. 30–35; Application Schs. C-3.6 and C-3.7. The referenced exhibit describes the 2025 variable-pay funding framework. For the 2025 Eversource executive incentive pool that was funded at 145% of target, provide the dollar amount of the pool at 100% target and the dollar amount funded at 145%.

UPA-037 (OFFICER VARIABLE COMPENSTION—INCENTIVES FUNDING POOL STRUCTURE) For the target pool:

a. show a breakdown of the 100% target pool by participant or anonymized participant, including eligible/base salary, applicable target incentive percentage, and target incentive dollars;
b. reconcile the sum of individual target incentive opportunities to the stated 100% target pool and the resulting 145% funded pool;
c. identify any adjustment, discretion, budget constraint, or amount added to or removed from the mathematical sum.

UPA-038 (OFFICER VARIABLE COMPENSTION—INCENTIVES FUNDING POOL STRUCTURE) Explain the complete organizational structure of the variable-pay funding arrangement applicable to the 2025 Test Year. Specifically, state:

a. whether the pool represents an actual segregated fund, reserve, accrued liability, budgetary authorization, compensation-control amount, or other accounting/management construct;
b. when the pool or associated compensation liability is initially recognized;
c. the general-ledger and FERC accounts in which the accrual and subsequent payment are recorded;
d. how the accrual is adjusted as corporate and individual performance becomes known;
e. whether Eversource maintains one enterprise-wide variable-pay pool or separate pools for executives/officers, non-officer employees, business units, operating companies, or other employee groups.

UPA-039 (OFFICER VARIABLE COMPENSTION—INCENTIVES FUNDING POOL STRUCTURE) Identify each incentive funding pool or sub-pool applicable to any employee or officer whose compensation is reflected in Schedule C-3.6 or C-3.7.

a. For each such pool, provide its target dollar amount, final funded dollar amount, final funding percentage, population covered, and relationship to any higher-level or lower-level pool.
b. Explain how funding is transferred or allocated from the enterprise level to executive, business-unit, manager, department, or individual levels; and
c. State whether any pool or sub-pool is required to equal, or is constrained by, an amount established at a higher organizational level.

UPA-040 (OFFICER VARIABLE COMPENSATION—SHORT-TERM INCENTIVE FUNDING FACTOR) Application, Ex. CLP-EMPLOYEE-1, pp. 30–35; Application, Schs. C-3.6 and C-3.7. With respect to the Company's reported 145% "Overall Performance" result for the 2025 annual incentive program, provide a complete reconciliation showing, separately for officers included in Schedule C-3.7 and other employees included in Schedule C-3.6:

a. aggregate eligible base salary or other eligible compensation;
b. target incentive percentage by participant level;
c. aggregate incentive compensation at 100% target;
d. the corporate, business-unit, operational, customer, financial, and individual performance factors applied;
e. how the 145% Overall Performance factor affected the available incentive pool or individual awards;
f. the resulting aggregate funded opportunity;
g. actual awards earned and/or paid; and
h. the amount ultimately recognized in Rate Year 1 and included in the revenue requirement.

UPA-041 (OFFICER VARIABLE COMPENSATION—AGGREGATE TARGET INCENTIVE BASE) Application, Ex. CLP-EMPLOYEE-1, pp. 30–38; Application, Sch. C-3.7. Explain how the dollar value of the target incentive pool is initially calculated before application of the corporate performance factor.

a. Provide an unlocked Excel workbook showing, for each Schedule C-3.7 participant or anonymized recipient:
   i. eligible base compensation used in the calculation;
   ii. applicable target incentive percentage;
   iii. resulting target incentive dollars;
   iv. a reconciliation of the individual target amounts to the aggregate target pool applicable to the Schedule C-3.7 population.
b. In a narrative response, explain the methodology used to determine eligible compensation for purposes of calculating the target incentive opportunity, including:
   i. whether eligible compensation is based on beginning-of-year, year-end, average, or actual earned salary; and
   ii. how promotions, salary changes, partial-year service, transfers, hires, and terminations are treated in determining eligible compensation and target incentive dollars.

UPA-042 (OFFICER VARIABLE COMPENSATION—EFFECT OF INDIVIDUAL PERFORMANCE ON TOTAL POOL EXPENDITURE) Application, Ex. CLP-EMPLOYEE-1, pp. 37–38; Application Sch. C-3.7. Explain whether individual officer or executive performance can change the total amount of variable compensation ultimately distributed by Eversource or whether individual performance primarily determines the allocation of a previously established pool. For the 2025 executive or officer population:

a. state whether the aggregate amount ultimately distributed could be less than the funded pool solely because of individual-performance results;
b. state whether an award to one individual above the applicable target or pool funding percentage requires a reduction in the award available to another individual or group;
c. identify any formal budget, pool, departmental, or manager-level constraint governing total awards;
d. provide the total amount of the funded executive/officer pool, the amount distributed, and the amount undistributed for 2025.

UPA-043 (OFFICER VARIABLE COMPENSATION—BASIS FOR INITIAL LONG-TERM INCENTIVE GRANT OPPORTUNITY) Application, Sch. C-3.7 and Sch. WP C-3.7; Ex. CLP-EMPLOYEE-1, pp. 7–11. For each job-scope level or position represented in the $1.331 million Rate Year long-term officer-variable-compensation amount in Schedule C-3.7, explain how the initial target long-term incentive opportunity is established before subsequent performance or vesting adjustments and provide:

a. target long-term incentive (LTI) opportunity as a percentage of base salary or other compensation measure;
b. the market survey, job-scope policy, Compensation Committee policy, employment agreement, retention determination, or other basis used to establish that percentage;
c. the title or position of the person who approves the initial target;
d. whether there is any discretion to depart from the standard target;
e. whether the target differs by award instrument, including performance shares, restricted stock units (RSUs), cash LTI, or another vehicle; and
f. any changes assumed from the Test Year through Rate Year 1.

UPA-044 (OFFICER VARIABLE COMPENSATION—LONG-TERM INCENTIVE AWARD-TO-EXPENSE RECONCILIATION) Application, Sch. C-3.7 and WP C-3.7; Ex. CLP-EMPLOYEE-1, p. 36. For each LTI award giving rise to expense included in the Test Year, Test Year Pro Forma, or Rate Year Schedule C-3.7 amounts, provide a reconciliation from the original award to the Rate Year amount expense, including:

a. award date;
b. target grant value;
c. number and type of units or shares granted;
d. grant-date fair value used for accounting;
e. applicable performance and vesting period;
f. accounting expense recognized in each year;
g. performance-related remeasurement or true-up, if applicable;
h. forfeiture assumptions and actual forfeitures;
i. treatment of dividend-equivalent units;
j. amount capitalized and amount expensed;
k. amount allocated to CL&P; and
l. amount included in the Rate Year amount.

Explain any difference among target award value, grant-date fair value, amount ultimately vested or paid, and accounting expense recovered through rates.

UPA-045 (OFFICER VARIABLE COMPENSATION—DISTRIBUTION AND CAPITALIZATION) Application, Sch. C-3.7 and WP C-3.7. For every dollar of Test Year officer/executive variable compensation ultimately included in Schedule C-3.7, provide a reconciliation showing the disposition of the underlying compensation cost among:

a. CL&P distribution O&M;
b. CL&P transmission expense or transmission revenue requirements;
c. CL&P capitalized construction costs;
d. other CL&P functions;
e. other Eversource operating companies;
f. amounts not recovered from customers;
g. identify whether capitalized amounts are included in rate base in this proceeding;
h. identify whether depreciation, carrying costs, or return associated with those capitalized compensation amounts is included in the Company's requested revenue requirement; and
i. demonstrate that no compensation amount included as an operating expense in Schedule C-3.7 is also recovered through rate base, depreciation expense, a tracker, transmission rates, or another recovery mechanism.

UPA-046 (OFFICER VARIABLE COMPENSATION—NORMALIZATION OF ABOVE-TARGET 2025 INCENTIVE PERFORMANCE FOR THE RATE YEAR) Application, Sch. WP C-3.7, rows 21–27 and notes (a) and (b). State whether the Test Year or Test Year Pro Forma officer-variable-compensation amount in Schedule C-3.7 reflects a corporate or executive funding factor above 100% of target, including the 145% executive incentive funding level disclosed for 2025. If so:

a. quantify the portion of Schedule C-3.7 attributable to performance above 100% of target;
b. explain why an above-target Test Year performance result is an appropriate normalized basis for Rate Year 1;
c. provide the Schedule C-3.7 Test Year Pro Forma and Rate Year amounts assuming corporate performance at exactly 100% of target;
d. provide the corresponding amounts using the average corporate funding factor for 2021–2025; and
e. explain why the Company's chosen Rate Year methodology is more representative than either alternative (i) the normalization at exactly 100% of target described in subpart c, or (ii) the normalization using the average corporate funding factor for 2021-2025 described in subpart d.

In the response, address whether use of the 2025 historical pro forma amount followed by Rate Year escalation embeds extraordinary above-target 2025 performance into prospective rates.

UPA-047 (OFFICER VARIABLE COMPENSATION—TREATMENT OF SUBSEQUENT FORFEITURES, CLAWBACKS, AND AWARD REVERSALS) Application, Sch. C-3.7 and WP C-3.7. For officer/executive short-term or long-term incentive compensation included in base rates:

a. describe how subsequent forfeitures, cancellations, clawbacks, performance-related reductions, accounting reversals, or other downward adjustments are recorded;
b. state whether and through what mechanism CL&P customers receive the benefit of such reductions where the original expense was recovered through rates;
c. identify all such reductions associated with officer/executive compensation during 2021–2025 and the portion attributable to CL&P; and
d. explain the proposed treatment of such adjustments during the performance-based multiyear rate plan (PBMRP).

UPA-048 (OFFICER VARIABLE COMPENSATION—INCENTIVES ASSOCIATED WITH THE CURRENT CL&P RATE CASE AND OTHER RATE-RECOVERY PROCEEDINGS) Application, Ex. CLP-EMPLOYEE-4B; Application Sch. C-3.7. Identify whether any 2026, 2027, or Rate Year performance goal, key initiative, annual incentive objective, long-term incentive objective, or other compensation criterion applicable to any officer/executive whose compensation is included or forecast in Schedule C-3.7 relates directly or indirectly to:

a. the outcome of Docket No. 26-05-10;
b. achievement of CL&P's requested revenue requirement or ROE;
c. approval of the proposed PBMRP or capital-support mechanism;
d. recovery of deferred, storm, capital, or other regulatory costs;
e. achievement of a particular regulatory treatment; or

f. improving the Company's assessment of Connecticut as a credit-supportive or balanced regulatory jurisdiction.

For each such objective, identify the affected officer, applicable weight or significance, potential compensation effect, and whether any resulting compensation is included in the Rate Year revenue requirement.