Date Filed: September 14, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: ALLCO

Question:

Identify each FERC account in which the Company records CIAC and other amounts collected from interconnection customers for interconnection studies, upgrades, and overheads, and state the balance in each such account at the end of each year 2018 through 2025 and as of the most recent month available.

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 records CIAC activity from interconnection customers to FERC Account No. 252500. The table below summarizes the end of year balance in FERC Account No. 252500 from 2018 through June 2026.

Year	Balance
December 2018	($5,569,769)
December 2019	($5,038,280)
December 2020	($9,076,090)
December 2021	($25,399,399)
December 2022	($11,263,859)
December 2023	($7,796,182)
December 2024	($10,334,276)
December 2025	($23,605,408)
June 2026	($28,277,769)

Date Filed: September 14, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Leanne M. Landry and Jeffrey D. Turano
Request from: ALLCO

Question:

State the total dollar amount of CIAC and interconnection-related payments collected from DER and QF interconnection customers in each year 2018 through 2025, and explain precisely how those amounts are reflected in (a) rate base, (b) the Test Year revenue requirement, and (c) the Rate Year revenue requirement proposed in this docket, identifying the specific schedules and workpapers.

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, please refer to the Company's response to ALLCO-001[i] for CIAC year-end balances from 2018 through 2025. CIAC and interconnection-related payments received by the Company reduce the cost of construction or plant placed in service. CIAC is recognized as an offset to the underlying capital project. CIAC would not be considered a component of rate base until the underlying capital project is placed in service. At that time, the underlying capital project costs in rate base would be wholly offset by CIAC at the time of final project billing and reconciliation. In the Company's next cost of service update, the rate base and the Rate Year revenue requirement will reflect the CIAC and the underlying capital project cost for projects placed in service.

Prior Referenced Response:

[i] ALLCO-001 Question:

Identify each FERC account in which the Company records CIAC and other amounts collected from interconnection customers for interconnection studies, upgrades, and overheads, and state the balance in each such account at the end of each year 2018 through 2025 and as of the most recent month available.

ALLCO-001 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 records CIAC activity from interconnection customers to FERC Account No. 252500. The table below summarizes the end of year balance in FERC Account No. 252500 from 2018 through June 2026.

Year	Balance
December 2018	($5,569,769)
December 2019	($5,038,280)
December 2020	($9,076,090)
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December 2022	($11,263,859)
December 2023	($7,796,182)
December 2024	($10,334,276)
December 2025	($23,605,408)
June 2026	($28,277,769)

Date Filed: September 21, 2026

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

Question:

Describe the methodology by which the Company sets the percentage "CIAC" or "overhead" rate applied to interconnection upgrade costs (including rates of 9.97%, 10.19%, 11.00%, 12.00%, and 13.00% applied to projects between 2018 and 2024), produce the workpapers deriving each such percentage, and state the actual project management and administration cost component, as a percentage of construction cost, realized on distributed generation interconnection projects completed in each year 2020 through 2025.

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 uses a "gross up" method when calculating the CIAC "tax adder" percentage. For an interconnection project, the Company requires each developer to advance adequate funds for the Company to maintain the full amount of funds, after paying the applicable State and Federal Income Tax, necessary to complete the construction. Furthermore, a discount rate is applied for the present value of the tax benefits associated with future tax depreciation. The Company applies the current prime rate as the discount rate pursuant to Order No. 2 of PURA's January 20, 1987, Decision in Docket No. 86-11-07. Below are the assumptions that the Company uses in the calculation:

Tax Rate	
Federal Tax Rate	0.21
State Tax Rate	0.0825
Prime Rate (Varies by year)	0.07
Tax Life	20 Years
Tax Depreciation Method	150% DB

Date Filed: September 14, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Warren R. Boutin, Leanne M. Landry and Jeffrey D. Turano
Request from: ALLCO

Question:

State whether refund obligations owed by the Company to interconnection customers following final accounting or reconciliation of interconnection projects ― including the $257,260.19 in refunds identified in the Company's December 2024 Final Accounting Reports for the Fisk, Plainfield, Voluntown 1240, and Bilton clusters ― are recorded as liabilities on the Company's books; identify the account(s), the total balance of such unpaid refund obligations at the end of each year 2022 through 2025, and state whether and how such balances are reflected in rate base, cash working capital, or the revenue requirement in this docket.

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, please refer to the Company's response to ALLCO-002[i] for "whether and how such balances are reflected in rate base, cash working capital, or the revenue requirement in this docket." The Company confirms that when a refund obligation is owed to interconnection customers following final accounting or reconciliation of interconnection projects, the refund obligation is recorded as a liability on the Company's books until the payment is issued to the interconnection customer.

Prior Referenced Response:

[i] ALLCO-002 Question

State the total dollar amount of CIAC and interconnection-related payments collected from DER and QF interconnection customers in each year 2018 through 2025, and explain precisely how those amounts are reflected in (a) rate base, (b) the Test Year revenue requirement, and (c) the Rate Year revenue requirement proposed in this docket, identifying the specific schedules and workpapers.

ALLCO-002 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, please refer to the Company's response to ALLCO-001 for CIAC year-end balances from 2018 through 2025. CIAC and interconnection-related payments received by the Company reduce the cost of construction or plant placed in service. CIAC is recognized as an offset to the underlying capital project. CIAC would not be considered a component of rate base until the underlying capital project is placed in service. At that time, the underlying capital project costs in rate base would be wholly offset by CIAC at the time of final project billing and reconciliation. In the Company's next cost of service update, the rate base and the Rate Year revenue requirement will reflect the CIAC and the underlying capital project cost for projects placed in service.

Date Filed: September 14, 2026

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

Question:

Provide an aging schedule of all unpaid interconnection-cost refunds owed to interconnection customers as of the most recent date available, showing for each: the project, the date the refund obligation was determined, the amount, and the reason payment has not been made; and describe the Company′s policy, procedure, and standard timeline for paying such refunds.

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 standard timeline for paying interconnection-cost refunds is set forth in Section 5.3.2 of the PURA-approved form of Interconnection Agreement.

Date Filed: September 21, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Warren R. Boutin, Leanne M. Landry and Jeffrey D. Turano
Request from: ALLCO

Question:

Separately from the customer deposits and customer advances addressed in OCC-74, OCC-75, and OCC-270, state the total amount of deposits, performance assurance, development period security, operating period security, and bid deposits held by the Company from renewable energy developers, qualifying facilities, and interconnection customers as of the end of the Test Year; identify where such amounts are recorded on the Company's books; state whether such amounts are treated as cost-free capital, an offset to rate base, or otherwise in the proposed revenue requirement; and state the amount of interest accrued and paid on such amounts in 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 total amount of performance assurance, development period security and operating period security held by the Company was $14,115,950 as of the end of 2025. These deposits are refundable to project owners upon completion of project milestones or, if forfeited, credited as an offset to program costs recovered through fully reconciling rates approved in the Company's annual Rate Adjustment Mechanism. As such, the funds are not available to the Company for other purposes and are not reflected in the proposed revenue requirement. Lastly, interest only accrues on a deposit when required under the terms of the agreement and is returned or forfeited with original deposit as described above.

Date Filed: September 14, 2026

Witness: Warren R. Boutin
Request from: ALLCO

Question:

State the number of pending distribution interconnection applications in Connecticut that have been pending for more than one year, more than three years, and more than five years, respectively, as of the most recent date available, and for each application pending more than five years, identify the application number, application date, requested capacity (MW), substation and circuit, and current status.

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 maintains and publishes an active interconnection queue for generators greater than 25 kW. The published queue identifies, among other information, the applicable substation, circuit, queue date, and project capacity. The Company also publishes hosting capacity maps that provide location-specific information, including hosting capacity values and DER currently online or in the queue. The information requested regarding individual projects and the applicable substations and circuits is available through the Company's publicly available interconnection resources.[1]

[1] https://www.eversource.com/residential/about/doing-business-with-us/interconnections/connecticut/connecticut-application-to-connect.

Date Filed: September 14, 2026

Witness: Lavelle A. Freeman, Juan F. Martinez, and Steven C. Osuch
Request from: ALLCO

Question:

Produce the data and workpapers supporting the statements in Exhibit CLP-TSP-2 at 43 that "about 260 MW is unable to interconnect without major substation upgrades" at eight identified substations and that "over 550 MW of large solar projects are similarly stuck in interconnection queues across all Eversource substations," including a project-level list showing application date, queue position, MW, substation, and circuit for each project comprising those figures.

Response:

The Company's analysis indicates that the available DER hosting capacity is constrained at each of the eight identified substations due to applicable substation equipment thermal loading limitations under the applicable system conditions. As a result, additional DER generation at these locations may require substation upgrades to safely and reliably accommodate interconnection. The applicable DER hosting capacity information is provided in ALLCO-008, Attachment 1.

The Company maintains and publishes an active interconnection queue for generators greater than 25 kW. The published queue identifies, among other information, the applicable substation, circuit, queue date, and project capacity. The Company also publishes hosting capacity maps that provide location-specific information, including hosting capacity values and DER currently online or in the queue. The information requested regarding individual projects and the applicable substations and circuits is available through the Company's publicly available interconnection resources.[1]

[1] https://www.eversource.com/residential/about/doing-business-with-us/interconnections/connecticut/connecticut-application-to-connect.

Date Filed: September 21, 2026

Witness: Lavelle A. Freeman, Juan F. Martinez, Steven C. Osuch and Warren R. Boutin
Request from: ALLCO

Question:

For the Card Street 11F substation and each circuit it serves (including Circuit 11F14), identify every interconnection application received since January 1, 2015, showing application number, application date, MW, current status, and (for interconnected projects) the date of interconnection approval and energization; and produce all hosting capacity analyses performed for that substation and its circuits since 2015.

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 maintains and publishes an active interconnection queue for generators greater than 25 kW. The published queue identifies, among other information, the applicable substation, circuit, queue date, and project capacity. The Company also publishes hosting capacity maps that provide location-specific information, including hosting capacity values and DER currently online or in the queue. The information requested regarding individual projects and the applicable substations and circuits is available through the Company's publicly available interconnection resources.[1]

[1] https://www.eversource.com/residential/about/doing-business-with-us/interconnections/connecticut/connecticut-application-to-connect.

Date Filed: September 04, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: ALLCO

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.

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**

Date Filed: September 04, 2026

Witness: Lavelle A. Freeman, Juan F. Martinez, and Steven C. Osuch
Request from: ALLCO

Question:

Produce the "preliminary analysis" referenced in Exhibit CLP-TSP-3 at 144 supporting the proposed "Avg. Interconnection Fee: < $500/kW," and the workpapers supporting the prospective SHARE fees of $392/kW (Tracy 14M group), $308/kW (Frybrook 13B group), and $192/kW (Campville 14R group) and the associated total distribution investment estimates of $180 million, $30 million, and $65 million (Exhibit CLP-TSP-3 at 146-149).

Response:

The high-level planning estimates were produced utilizing historical project and unit costs for the preliminary anticipated scopes of these projects. As the SHARE program is a proposed concept, at this time, specific impact studies have not been completed, no level engineering has been performed, and therefore estimates are not available with any more detail than provided in this response. Following PURA's approval of the SHARE program and the proposed projects, engineering studies would be conducted to develop more detailed scopes and estimates, and project benefits, costs, viability and constructability would evaluated during our internal capital project review and approval process.

The SHARE fee represented in the testimony was produced with the following formula:

$$SHARE\ FEE\ in\ \$/kW = \frac{\text{Total DER Customer Benefit Upgrade Cost in \$M}}{\text{Estimated Enabled Commercial DER Capacity in MVA}} x1000$$

where 1000 represents the combined unit conversion of Millions of Dollars to Dollars and MVA to kW:

$$\$1000/kW = \frac{\$1{,}000{,}000}{1000\ \text{kW}}$$

In these calculations, kW and MW are used synonymously with kVA and MVA given the typical unity power factor of inverter-based generation while substation assets are rated in Volt-Amperes to account for both the apparent and reactive components of capacity of the equipment.
A breakdown of the components for the Tracy 14M Group SHARE fee is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Total Upgrade Cost
Distribution Station	$61.0M	$44M	$35M	**$140M**
Distribution Line	$24.5M	$7M	$9M	**$40M**
Total:	**$85.5M**			**$180M**
Enabled Capacity:	**218 MVA**			
SHARE Fee:	**$392 /KW**			

The SHARE fee represented in this table is produced with the following formula:

$$\$392/kW = \frac{\$85.5M}{218MVA} x1000$$

A breakdown of the components for the Frybrook 13B Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$9.1M	$11M	$0M	**$20M**
Distribution Line	$7.2M	$2M	$1M	**$10M**
Total:	**$16.3M**			**$30M**
Enabled Capacity:	**53 MVA**			
SHARE Fee:	**$308 /KW**			

The SHARE fee represented in this table is produced with the following formula:

$$\$308/kW = \frac{\$16.3M}{53MVA} x1000$$

A breakdown of the components for the Campville 14R Group is shown below:

Project Type	DER Customer Benefit	Distribution Customer Reliability Benefit	Distribution Customer Capacity Benefit	Upgrade Cost
Distribution Station	$28.0M	$21M	$5M	$54M
Distribution Line	$8.1M	$2M	$1M	$11M
Total:	**$36.1M**			**$65M**
Enabled Capacity:	**188 MVA**			
SHARE Fee:	**$192 /KW**			

The SHARE fee represented in this table is produced with the following formula:

$$\$192/kW = \frac{\$36.1M}{188MVA} x1000$$

Date Filed: September 04, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: ALLCO

Question:

Explain how SHARE program investments and SHARE fee revenues would be treated in rate base, depreciation expense, and the revenue requirement, in this docket and prospectively; state whether any SHARE-related capital expenditures are included in the capital additions or five-year investment plan for which recovery is sought in this docket; and identify them.

Response:

In Docket No. 22-06-29RE01, the Company introduced the Shared Hosting for Advancement of Renewable Energy ("SHARE") program as a means to cost effectively enable Distributed Energy Resource ("DER") interconnection and to ensure that interconnection upgrade costs are equitably allocated among DER customers and non-DER customers.

In that proceeding, the EDCs (CL&P and The United Illuminating Company) collectively submitted comments in response to PURA's Notice of Request for Written Comments issued on December 22, 2023. In those comments, the EDCs comments indicated that the following framework would need to be established in order to effectuate the SHARE program:

> The EDC will recover the costs of the Interconnection Solution through two channels. First, interconnecting customers in the Group will offset the upfront construction or implementation costs through a $/kW Interconnection Solution fee based on the interconnecting facility's prorata share of the cost of the Interconnection Solution. Interconnecting customers in the Group shall pay a portion of the total Interconnection Solution cost based on technical analysis. This fee will be treated as a contribution in aid of construction ("CIAC") and will be grossed up for taxes to ensure the full CIAC, plus gross-up, will hold distribution customers harmless on the deferred income tax implication to rate base in each Company's next rate case. Second, the EDC will recover the remaining Interconnection Solution incurred costs with subsequent recovery from distribution customers through a rate reconciliation mechanism the Authority reviews and approves in the RAM proceeding. Distributed energy resource (DER) facilities that connect to the distribution system at a future time using the newly enabled hosting capacity will pay all of the associated Interconnection Solution fee, which will be flowed through the same rate reconciliation mechanism and credited back to

distribution customers. *Docket 22-06-29RE01, February 14, 2024 EDC comments in response to PURA request for written comments on December 22, 2023.*

In this proceeding, the Company presented Exhibit CLP-TSP-3 in which it provided three investment scenarios; 1) Sustained Performance, 2) Targeted System Performance, and 3) Advancing the Grid. In this proceeding, the Company has proposed to implement in base rates the capital expenditures associated with the Targeted System Performance scenario presented in Exhibit CLP-TSP-3, which does not include SHARE investments.

However, the five-year investment Advancing the Grid plan includes specific investments to upgrade 3 bulk substations, build 2 new bulk substations and add new distribution feeder capacity in three (3) areas of the system to improve hosting capacity for DER integration. The high-level planning estimate for these major upgrades is approximately $275M, which would be allocated equally between DER customers and distribution customers based on a preliminary technical review of benefits (Exhibit CLP-TSP-3 at 146 to 149). Based on anticipated study, engineering, and construction schedules, $47.6M of capital expenditure is included in the five-year investment plan under the Advancing the Grid Investment Scenario (Exhibit CLP-TSP-3 at 9).

Should PURA opt to support the Advancing the Grid plan as part of this proceeding, or, in a future proceeding, implement the SHARE program and associated cost recovery as proposed by the EDCs in Docket No. 22-06-29RE01, the gross investments would be reflected in plant in service installed by the Company. As described above, Interconnection Solution fees would be collected as a CIAC which would offset plant in service in rate bae. Depreciation expense would be calculated on the gross plant additions, less the CIAC. The revenue requirement that customers would pay through a rate reconciliation mechanism would be calculated on the gross plant investment, less the CIAC.

Date Filed: September 14, 2026

Witness: Lavelle A. Freeman, Juan F. Martinez, and Steven C. Osuch
Request from: ALLCO

Question:

With respect to the contemplated "Bul Substation near Hampton" (Exhibit CLP-TSP-3 at 146): state its proposed scope, cost estimate, and in-service timing; identify the in-queue projects it is intended to enable, including their application dates and queue positions; and state how projects with pending applications at the Card Street 11F substation or on Circuit 11F14 ― including applications pending since 2017 and 2018 ― would be treated under the SHARE proposal, including whether and how amounts previously paid by such earlier-queued customers (deposits, study fees, CIAC, and upgrade payments) would be credited against any SHARE fee.

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, as outlined in Exhibit CLP-TSP-3 at 146, the proposed new bulk substation would be needed to support Tracy 14M, Brooklyn 30Y, and Mansfield 12J. This project is intended to safely and reliably accommodate large-scale DER growth in the area served by the three existing substations, improve system reliability, and resolve capacity constraints due to recent commercial load growth in the region. The preliminary scope of the project includes construction of a new bulk substation with two standard size transformers supplied by transmission sources, and new distribution feeders to pick up loads from the other aforementioned substations in the group, accommodate new loads, connect in-queue DER and enable future DER connections. The project is still in the very early planning stage and no system studies, engineering design or detailed cost estimates have been performed to determine detailed scope, equipment needs, site requirements, resource availability, procurement and construction schedules and myriad other issues that can affect cost and schedule. Therefore, it is not possible, at this preliminary stage, to provide more granularity on scope, cost estimate, and in-service timing than included in Exhibit CLP-TSP-3.

If the project were to be constructed today, the in-queue projects it would be intended to enable, including application dates and queue position are available for each of the three substations in the

published CT DER Queue located on the Company's Connecticut Application to Connect website.[1]

As there are no projects in-queue at the Card Street 11F substation impacted by the preliminary design of this project, it is not possible to say specifically how they would be treated under this SHARE proposal. However, in general, the $/kW SHARE fee would not apply to Level 1 projects. All other projects interconnecting to the group of stations (existing and new) will be required to pay the $/kW SHARE fee which is intended to recover the portion of the cost of common distribution upgrades allocated to DER customers from current (in-queue) and future DER benefiting from those upgrades. This fee does not replace any additional fees associated with interconnection including, but not limited to, application fees, study fees, point-of-interconnection costs or individual or project upgrade requirements identified by a system impact study, such as the installation of a DER Gateway and other project-specific upgrades.

If the SHARE Program is approved, the Company will work with stakeholders to develop a Group Study Agreement that outlines how projects with pending applications would be treated including whether and how amounts previously paid by such earlier-queued customers (deposits, study fees, CIAC, and upgrade payments) would be handled.

[1] https://www.eversource.com/residential/about/doing-business-with-us/interconnections/connecticut/connecticut-application-to-connect

Date Filed: September 04, 2026

Witness: Lavelle A. Freeman, Juan F. Martinez, and Steven C. Osuch
Request from: ALLCO

Question:

State whether participation in the SHARE program would be a condition of interconnection for new or pending applications in SHARE target areas, and describe the interconnection path and cost responsibility for a queued project in a SHARE target area that declines to pay the SHARE fee.

Response:

If the SHARE Program is approved, the Company will work with stakeholders to develop a Group Study Agreement. Based on experience in another jurisdiction, new or pending applications in SHARE target areas would have the option to participate in the SHARE Group Study that determines the Group Solution and associated SHARE fee. If a project elects not to participate in the Group Study, the opt-out project will be queued for study after the Group Study is complete. If there is excess enabled capacity (due to use of standard size equipment) remaining after the Group Study projects have received interconnection agreements (IA), any remaining projects in queue would be eligible to connect and pay the SHARE fee (after their subsequent study). A queued project in a SHARE target area that declines to pay the SHARE fee would be removed from the queue, consistent how a project that declines to pay for the system upgrades identified in a study and outlined in an IA is treated under the current interconnection process.

Date Filed: September 14, 2026

Witness: Andrew C. Belden
Request from: ALLCO

Question:

In addition to the milestone-component information requested in OCC-137, produce the "recent historical performance" data on which the Company based the proposed 35-business-day target for the Level 1 DER Interconnection Processing component of the Customer PIM Suite (Exhibit CLP-CUSTOMER-1 at 35), including, for each year 2020 through 2025, the annual average number of business days from (a) receipt of a complete DER interconnection application to conditional approval, and (b) municipal inspection to issuance of Permission to Operate, reported separately for residential and non-residential projects.

Response:

Please refer to ALLCO-015, Attachment 1, for the recent historical performance data on which the Company based the proposed 35-business-day target for the Level 1 DER Interconnection Processing component of the Customer PIM Suite. Only residential projects qualify to apply as Level 1 thus, ALLCO-015, Attachment 1, does not include separately reported non-residential data.

Although ALLCO-015, Attachment 1, includes the requested range of 2020-2025, note the metric development only considered the years 2022 through 2025, as the implementation of the Residential Renewable Energy Solutions (RRES) program in 2022 necessitated changes to the interconnection application process to include RRES qualification review. Data prior to 2022 is not representative of the current process. The historical data also may contain time in the applicant queue due to tracking capabilities available in those years.

Date Filed: September 04, 2026

Witness: Andrew C. Belden
Request from: ALLCO

Question:

State, for each year 2020 through 2025, the number and aggregate MW of DER interconnection applications that would be excluded from the proposed Level 1 DER Interconnection Processing metric because they "require electric power system modifications" (Exhibit CLP-CUSTOMER-1 at 34 n.22), as a count and as a percentage of all applications and of all applied-for MW, and explain the basis for excluding such projects from a metric intended to measure interconnection performance.

Response:

Please refer to ALLCO-016, Attachment 1, which specifies the number, percentage, and MW of Level 1 DER interconnection applications that required electric power system modifications. These projects are proposed to be excluded from the Level 1 DER Interconnection Processing PIM since they represent time periods outside the scope of a standard project. In addition, the system modification process is not tracked in PowerClerk to the level of detail the PIM requires, which is designed to only track the time requiring Company action.

Date Filed: September 14, 2026

Witness: Warren R. Boutin
Request from: ALLCO

Question:

State the average and maximum elapsed time, in each year 2019 through 2025, between the Company's receipt of an interconnection agreement executed by a Connecticut generator and the Company's countersignature and return of that agreement, and identify each instance exceeding 180 days, including project LEG-22708.

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 does not track information on the average and maximum elapsed time between the receipt of a partially-executed interconnection agreement ("IA") from a Generator and the Company's countersignature and return of the fully-executed IA to the Generator. Starting in early 2026, the IA execution process was enhanced to leverage automation available in PowerClerk; therefore, the execution dates are now recorded electronically in a software platform.

Date Filed: September 14, 2026

Witness: Danielle Munson
Request from: ALLCO

Question:

The Office of Consumer Counsel has requested extensive discovery regarding variable, incentive, and executive compensation generally (see, e.g., OCC-199, OCC-202, OCC-286 through OCC-300, OCC-369, and OCC-370), which Allco does not repeat. Allco asks only: state whether any portion of executive compensation, variable (incentive) compensation, or Eversource Energy Service Company charges is included in the overhead rates, loaders, or general and administrative components applied to interconnection project costs charged to interconnection customers as CIAC or "overheads"; if so, identify each loader component and its rate, and quantify the amounts so charged to interconnection customers in each year 2020 through 2025.

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, with respect to Eversource's executive management, there is no portion of their compensation included in the overheads and/or loaders charged to interconnection projects.

Date Filed: September 04, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: ALLCO

Question:

With respect to the injuries and damages expense, judgments and settlements, and outside legal expense that are the subject of OCC-303, OCC-308, and OCC-309, identify the portion of each that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers (including disputes with Allco or its affiliates), stating the amount, FERC account, and matter; and state whether the Company proposes to recover through rates any judgment, settlement, refund, or interest obligation arising from such disputes.

Response:

With respect to the Company's response to OCC-303[i], CL&P does not track injuries and damages expense in a format that would allow the Company to identify the portion of expense that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers.

With respect to the Company's response to OCC-308[ii], there are no judgments and/or settlements resulting from lawsuits brought by distributed generation developers, qualifying facilities, or interconnection customers.

With respect to the Company's responses to OCC-309[iii], CL&P does not track legal expense in a format that would allow the Company to identify the portion of expense that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers.

Prior Referenced Responses:

[i] OCC-303 Question:

Injuries and Damages.

a. Provide the injuries and damages expense (direct and allocated) for each of the years 2021, 2022, 2023, 2024, 2025, and included in the rate year. Provide calculations showing how the rate year expense was derived.

b. Provide the injuries and damages reserve balances (direct and allocated), including debits and credits to the reserve, for each of the years 2021 through 2025.

OCC-303 Response:

a. Please refer to the table below for the injuries and damage expense for years 2021 through 2025.

Year	**2021**	**2022**	**2023**	**2024**	**2025**
Workers' Compensation	$775,433	$811,947	$864,244	$908,661	$929,097
Public Liability	$2,407,758	$2,933,449	$4,007,554	$3,753,055	$2,925,703

Please refer to OCC-303, Attachment 1, for the calculation of the Rate Year expense for Workers' Compensation.

The Company calculated the Rate Year level of expense for Public Liability using the most recent actuarial report and monthly accrual expense. This accrual was $318,932 direct and $187 allocated per month.

b. Please refer to OCC-303, Attachment 2, for the injuries and reserves balance, including debits and credits to the reserve, for each of the years 2021 through 2025.

[ii] OCC-308 Question:

Judgments/Settlements (Direct and Allocated).

a. Please provide, in list form, the details of all judgments and/or settlements resulting from suits brought which involved the Company or affiliates as a defendant, which resulted in the Company or affiliates, during the test year, paying or agreeing to pay or being ordered to pay an amount in excess of $10,000, including but not limited to the case name, a brief description of the case, the date filed, the date of settlement or the date of judgment and the amount the Company or affiliates was ordered or agreed to pay. Provide this information even if appeals are pending and note every instance of an appeal.

b. Provide the total amount of judgments/settlements expense (direct and allocated) for each of the years 2021, 2022, 2023, 2024, 2025, and the amount included in the rate year.

OCC-308 Response:

a. Please refer to OCC-308, Attachment 1 CONFIDENTIAL, for a list of all judgements and/or settlements resulting from suits brought in federal or state court, which resulted in the Company either paying or agreeing to pay an amount in excess of $10,000 during the years 2021, 2022, 2023, 2024, and 2025.

b. Settlements and judgments that are property damage or bodily injury claims are funded out of the Company's public liability reserve up to $1 million. Property damage and bodily injury settlements and judgements over $1 million are covered by the Company's excess liability insurance. The Company has included $3.829 million in its Rate Year to accrue into the public liability reserve which is recovered from customers through base distribution rates. The table below summarizes the public liability expense for each year 2021 through 2025 and the legal settlement payments that are not covered by the Public Liability Reserve and excess liability insurance.

[iii] OCC-309 Question:

Legal Expense. Please itemize the amount of outside legal expense (direct and allocated) (excluding rate case expense, by vendor, for each of the years 2021, 2022, 2023, 2024, 2025, and the amount included in the rate year.

OCC-309 Response:

Please refer to OCC-309, Attachment 1, which lists the Company's outside legal expenses by vendor for each of the years 2021, 2022, 2023, 2024, 2025 (Test Year). The Company's outside legal expenses for the Rate Year totaled $5.388 million, which were calculated using the GDP-PI escalation factor against the Test Year Pro-Forma, as provided in Exhibit CLP-REVREQ-2 Schedule C-3.20.