Date Filed: September 03, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Please refer to Exhibit CLP-RATES-1, at 34, lines 5-7: "For an average customer without a heat pump, average usage across the year is approximately 700 kWh per month, with some degree of seasonal variability." For customers without a heat pump, what is the average monthly usage of the median customer for each month of the year?

Response:

At this time, the Company is unable to differentiate which Rate 1 customers have or do not have heat pumps, and determine the average monthly usage of median Rate 1 customers as requested. For a Rate 1 customer with an average usage across the year of 700 kWh, the average monthly usage would be as follows:

Month	Average Usage (kWh)
January	779
February	695
March	638
April	598
May	538
June	660
July	908
August	956
September	781
October	574
November	570
December	704
Annual Average	**700**

Date Filed: September 03, 2026

Witness: Edward A. Davis, Kimberly R. Parsons, Matthew Nelson and Michael Goldman
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Please refer to Exhibit CLP-RATES-1, at 32, lines 7-8: "Rate 6 will be available to any residential customer that currently heats with a delivered fuel heating system and demonstrates that it has installed air-source heat pump(s) or any new home build after July 1, 2027, that can demonstrate that they have installed air- source heat pump(s) for home space heating."

a. Please provide the definition of a "delivered fuel heating system" the Company would use to determine customer eligibility for Rate 6.
b. Is a heating system using natural gas considered a "delivered fuel heating system"? If not, why not?
c. Please provide copies of all notes, memorandum, reports, e-mails and text messages which discuss, reference, or conclude: 1) whether to include or exclude natural gas heating systems within the definition of a "delivered fuel heating system"; and/or 2) whether to provide eligibility for the new Rate 6 rate to Rate 1 customers who replace a natural gas heating system with an electric heat pump.
d. Why are new or existing geothermal heat pump customers not eligible for the proposed rate?
e. If a customer becomes eligible for and takes service under Rate 6, and subsequently either sells the dwelling or rents it, will the new owner or tenant remain eligible for Rate 6? If not, why not?
f. If a customer in a single dwelling unit becomes eligible for and takes service under rate 6 and subsequently converts the property to multiple dwelling units, will the customers in the new multiple dwelling units remain eligible for Rate 6? If not, why not?

Response:

a. A "delivered fuel heating system" is intended to refer to a heating system that runs on a fuel source like heating oil or propane, which is brought to the property by a truck and pumped into an on-site storage tank, rather than flowing through a permanent underground utility line. A heating system using natural gas is not considered a delivered fuel heating system because it does not meet this definition.

b. The Company deliberately excluded natural gas heating conversions from Rate 6 eligibility because Rate 6 is an affordability measure not a general electrification incentive. The rate is targeted at conversions that reduce the customer's total household energy costs. For customers heating with oil or propane, the highest-cost and most price-volatile heating fuels in Connecticut, conversion to an air-source heat pump generally lowers total annual heating expense, and Rate 6 further supports that outcome.

   For customers heating with natural gas, conversion to a heat pump typically increases the household's total energy bill at current prices. The Company is cognizant of the real affordability challenges for customers in Connecticut and therefore designed the rate to avoid encouraging conversions that would likely result in higher customer household energy. While natural gas conversions may produce emissions benefits, Rate 6 is designed to deliver bill savings, and eligibility was scoped accordingly.

c. The Company does not have reports on its decision to limit Rate 6 to delivered fuel conversions but refers to the pre-filed testimony set forth in Exhibit CLP-IAP-1, which focused on Investment & Affordability Policy, demonstrating the Company's strong emphasis in submitting proposals designed to address affordability.

d. Geothermal customers were not included in the eligibility for Rate 6 because Rate 6 is designed around the operating profile of air-source heat pumps, which experience declining efficiency and materially higher electricity consumption during the coldest portions of the heating season. This is the seasonal bill escalation the rate is designed to mitigate. Ground source systems maintain substantially higher and more stable cold-weather efficiency, so the winter bill impact Rate 6 addresses is far less pronounced for those customers. As DEEP describes, a geothermal system is more efficient than air-source heat pumps and far more efficient than systems relying on combustion of fossil fuels, and because it has relatively modest maintenance requirements, its operating cost typically is quite low, enabling homeowners and businesses to reduce their monthly expenses (see https://portal.ct.gov/deep/energy/renewable-energy/geothermal).

   Ground source installations also carry substantially higher upfront costs, however, meaning a volumetric rate discount may not provide a significant enough incentive for adoption. Air-source heat pump technology represents the overwhelming majority of Connecticut residential heat pump installations; focusing eligibility on air-source heat pumps simplifies verification and administration. It should also be noted that there are energy efficiency incentives through Energize CT for ground source heat pumps, with the current incentive levels for ground source heat pumps being higher than air source heat pumps, in recognition of the initial upfront capital hurdle for ground source heat pumps.

e. If a customer becomes eligible for and takes service under Rate 6, and subsequently either sells the dwelling or rents it, the new owner or tenant will remain eligible for Rate 6 because the rate will be attached to the meter. Additionally, the rate will continue to encourage the customer to use their heat pumps for space heating. This promotes affordability for the customer, encourages overall stable winter load for the grid, and supports climate goals.

f. If a customer in a single dwelling unit becomes eligible for and takes service under Rate 6 and subsequently converts the property to multiple dwelling units, the new service configuration will need to be evaluated before determining whether the new dwelling unit(s) will remain eligible for Rate 6.

Date Filed: September 03, 2026

Witness: Edward A. Davis, Kimberly R. Parsons, Matthew Nelson and Michael Goldman
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Proposed Rate 6 is described as "designed to provide a discounted rate for the incremental usage of residential electric service customers who adopt new electric air source heat pump technologies for space heating purposes?" Exhibit CLP-RATES-1, at 31, lines 16-18.

a. What is the purpose of the discount? What goal does the Company seek to accomplish with the discount?
b. How did the Company determine that the proposed level of the discount is sufficient to satisfy that goal?

Response:

a. The purpose of the discount is to address affordability. The discount serves the Company's broader affordability objectives in two ways. First, at the individual customer level, Rate 6 mitigates the winter bill escalation that accompanies air source heat pump adoption, supporting customers in realizing the bill savings from high-cost delivered fuels. Heat pump operation can substantially increase winter electricity consumption, and without a rate response, that seasonal increase can erode or eliminate the economic benefit of switching from oil or propane. Second, at the system level, the rate adds incremental load priced above the marginal cost of serving it, so each incremental kilowatt-hour contributes to recovery of the Company's cost of providing service. Spreading fixed costs over a larger sales base places downward pressure on average rates for all customers over time. This provides an economic benefit for all residential customers, not just Rate 6 participants. Rate 6 is deliberately structured as an affordability measure rather than a broad electrification subsidy; however, this also allows for value stacking with electrification incentives provided through energy efficiency or other programs.

   Rate 6 provides an affordability pathway for customers who adopt air source heat pump technology in circumstances where conversion makes economic sense, without requiring a substantive increase to non-participating customers to fund the discount.

b. The Company determined the level of the effective discount by reference to cost causation. The discounted rate is set to cover the incremental cost of serving the additional load the

converting customer adds, which establishes the floor; the standard residential rate establishes the reference point above it. The discount is the space between those two, and it is sized to be no deeper than that space. A Rate 6 customer pays to cover the incremental cost of serving that customer, such that no portion of that customer's cost of service is redistributed to non-adopting customers. The result is a more affordable rate for the customer making the conversion decision, achieved without imposing an offsetting burden on customers taking service under the standard rate. This is the level of discount the Company determined it could offer within those constraints.

Date Filed: September 03, 2026

Witness: Edward A. Davis, Kimberly R. Parsons, Matthew Nelson and Michael Goldman
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Why is the Company proposing that Rate 6 will only be available for R1 customers who install a new heat pump system after January 1, 2026? What rate design or revenue design goal is satisfied by limiting Rate 6 eligibility to such customers?

Response:

As discussed in the Company's responses to interrogatories CLF-002[i], and CLF 003[ii], Rate 6 is designed as a targeted affordability measure, a pathway for customers making the conversion decision from delivered fuels, not as a statewide electrification program.

The rate is intended to both influence the conversion decision at the margin and to add incremental load that contributes to cost recovery. Extending the discounted rate to existing customers who installed heat pumps before the rate existed would produce no incremental adoption and no incremental load; it would simply reduce revenue collected on existing consumption and shift recovery of that revenue to other customers.

Providing a discount to customers who already converted would not be a system wide affordability measure; rather, it would merely be an individual customer discount, which the Company's design deliberately avoids. Limiting eligibility to new installations is the residential analogue of the incremental-load requirement in the Company's proposed economic development rates: the rate is reserved for new load and conversions that will ultimately provide appropriate cost recovery. Customers who already converted elected to do so based on the economic circumstances at the time of their installation.

Prior Referenced Responses:

[i] CLF-002 Question:

(SPACE HEATING RATE) Please refer to Exhibit CLP-RATES-1, at 32, lines 7-8: "Rate 6 will be available to any residential customer that currently heats with a delivered fuel heating system and demonstrates that it has installed air-source heat pump(s) or any new home build after July 1, 2027, that can demonstrate that they have installed air- source heat pump(s) for home space heating. "

a. Please provide the definition of a "delivered fuel heating system" the Company would use to determine customer eligibility for Rate 6.
b. Is a heating system using natural gas considered a "delivered fuel heating system"? If not, why not?
c. Please provide copies of all notes, memorandum, reports, e-mails and text messages which discuss, reference, or conclude: 1) whether to include or exclude natural gas heating systems within the definition of a "delivered fuel heating system"; and/or 2) whether to provide eligibility for the new Rate 6 rate to Rate 1 customers who replace a natural gas heating system with an electric heat pump.
d. Why are new or existing geothermal heat pump customers not eligible for the proposed rate?
e. If a customer becomes eligible for and takes service under Rate 6, and subsequently either sells the dwelling or rents it, will the new owner or tenant remain eligible for Rate 6? If not, why not?
f. If a customer in a single dwelling unit becomes eligible for and takes service under Rate 6 and subsequently converts the property to multiple dwelling units, will the customers in the new multiple dwelling units remain eligible for Rate 6? If not, why not?

CLF-002 Response:

a. A “delivered fuel heating system” is intended to refer to a heating system that runs on a fuel source like heating oil or propane, which is brought to the property by a truck and pumped into an on-site storage tank, rather than flowing through a permanent underground utility line. A heating system using natural gas is not considered a delivered fuel heating system because it does not meet this definition.

b. The Company deliberately excluded natural gas heating conversions from Rate 6 eligibility because Rate 6 is an affordability measure not a general electrification incentive. The rate is targeted at conversions that reduce the customer’s total household energy costs. For customers heating with oil or propane, the highest-cost and most price-volatile heating fuels in Connecticut, conversion to an air-source heat pump generally lowers total annual heating expense, and Rate 6 further supports that outcome.

   For customers heating with natural gas, conversion to a heat pump typically increases the household’s total energy bill at current prices. The Company is cognizant of the real affordability challenges for customers in Connecticut and therefore designed the rate to avoid encouraging conversions that would likely result in higher customer household energy. While natural gas conversions may produce emissions benefits, Rate 6 is designed to deliver bill savings, and eligibility was scoped accordingly.

c. The Company does not have reports on its decision to limit Rate 6 to delivered fuel conversions but refers to the pre-filed testimony set forth in Exhibit CLP-IAP-1, which focused on Investment & Affordability Policy, demonstrating the Company’s strong emphasis in submitting proposals designed to address affordability.

d. Geothermal customers were not included in the eligibility for Rate 6 because Rate 6 is designed around the operating profile of air-source heat pumps, which experience declining efficiency and materially higher electricity consumption during the coldest portions of the heating season. This is the seasonal bill escalation the rate is designed to mitigate. Ground source systems maintain substantially higher and more stable cold-weather efficiency, so the winter bill impact Rate 6 addresses is far less pronounced for those customers. As DEEP describes, a geothermal system is more efficient than air-source heat pumps and far more efficient than systems relying on combustion of fossil fuels, and because it has relatively modest maintenance requirements, its operating cost typically is quite low, enabling homeowners and businesses to reduce their monthly expenses (see https://portal.ct.gov/deep/energy/renewable-energy/geothermal).

   Ground source installations also carry substantially higher upfront costs, however, meaning a volumetric rate discount may not provide a significant enough incentive for adoption. Air-source heat pump technology represents

the overwhelming majority of Connecticut residential heat pump installations; focusing eligibility on air-source heat pumps simplifies verification and administration. It should also be noted that there are energy efficiency incentives through Energize CT for ground source heat pumps, with the current incentive levels for ground source heat pumps being higher than air source heat pumps, in recognition of the initial upfront capital hurdle for ground source heat pumps.

e. If a customer becomes eligible for and takes service under Rate 6, and subsequently either sells the dwelling or rents it, the new owner or tenant will remain eligible for Rate 6 because the rate will be attached to the meter. Additionally, the rate will continue to encourage the customer to use their heat pumps for space heating. This promotes affordability for the customer, encourages overall stable winter load for the grid, and supports climate goals.

f. If a customer in a single dwelling unit becomes eligible for and takes service under rate 6 and subsequently converts the property to multiple dwelling units, the new service configuration will need to be evaluated before determining whether the new dwelling unit(s) will remain eligible for Rate 6.

[ii]CLF-003 Question:

(SPACE HEATING RATE) Proposed Rate 6 is described as "designed to provide a discounted rate for the incremental usage of residential electric service customers who adopt new electric air source heat pump technologies for space heating purposes? " Exhibit CLP-RATES-1, at 31, lines 16-18.

a. What is the purpose of the discount? What goal does the Company seek to accomplish with the discount?
b. How did the Company determine that the proposed level of the discount is sufficient to satisfy that goal?

CLF-003 Response:

a. The purpose of the discount is to address affordability. The discount serves the Company's broader affordability objectives in two ways. First, at the individual customer level, Rate 6 mitigates the winter bill escalation that accompanies air source heat pump adoption, supporting customers in realizing the bill savings from high-cost delivered fuels. Heat pump operation can substantially increase winter electricity consumption, and without a rate response, that seasonal increase can erode or eliminate the economic benefit of switching from oil or propane. Second, at the system level, the rate adds incremental load priced above the marginal cost of serving it, so each incremental kilowatt-hour contributes to recovery of the Company's cost of providing service. Spreading fixed costs over a larger sales base places downward pressure on average rates for all customers over time. This provides an economic benefit for all residential customers, not just Rate 6 participants. Rate 6 is deliberately structured as an affordability measure rather than a broad electrification subsidy; however, this also allows for value stacking with electrification incentives provided through energy efficiency or other programs.

   Rate 6 provides an affordability pathway for customers who adopt air source heat pump technology in circumstances where conversion makes economic sense, without requiring a substantive increase to non-participating customers to fund the discount.

b. The Company determined the level of the effective discount by reference to cost causation. The discounted rate is set to cover the incremental cost of serving the additional load the converting customer adds, which establishes the floor; the standard residential rate establishes the reference point above it. The discount is the space between those two, and it is sized to be no deeper than that space. A Rate 6 customer pays to cover the incremental cost of serving that customer, such that no portion of that customer's cost of service is

redistributed to non-adopting customers. The result is a more affordable rate for the customer making the conversion decision, achieved without imposing an offsetting burden on customers taking service under the standard rate. This is the level of discount the Company determined it could offer within those constraints.

Date Filed: September 03, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Did the Company conduct any customer surveys or hold any focus groups as part of its process in designing Rate 6? If yes, please provide all reports, memorandums, or papers resulting from such surveys or focus groups.

Response:

No, the Company did not conduct any customer surveys or hold any focus groups as part of its process in designing proposed Rate 6.

Date Filed: September 03, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Did the Company meet with and/or discuss the development of Rate 6 with any heat pump related trade groups, manufacturers, or distributors?

Response:

The Company met with representatives of CLF to provide an overview and discuss the design of Rate 6 while still under development but did not meet and/or discuss the development of Rate 6 with any heat pump related trade groups, manufacturers, or distributors.

Date Filed: September 03, 2026

Witness: Edward A. Davis, Kimberly R. Parsons and Megan Bernardini
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Please describe the Company's plan to notify customers about the availability of Rate 6. Provide copies of all advertising, marketing and educational materials, including bill inserts, transcripts of any media spots, and scripts for customer service representatives. If such materials have not been prepared, when does the Company intend to provide them for review and comment by interested parties?

Response:

Pending approval of the Space Heating Rate, the Company will communicate availability of the rate and potential cost savings through a variety of channels, which may include:

- Bill inserts
- On-bill messaging
- Information on eversource.com
- Direct email and/or letter
- Customer e-newsletter
- Outreach to community leaders, legislators and community-based organizations
- Traditional and social media
- Talking points for Customer Service Representatives

These materials will be developed prior to the potential launch of the rate, when details of the rate design are finalized and approved. It is the Company's standard practice, as time allows, to solicit feedback on customer messaging with our online customer panel. That feedback will be incorporated into the final messaging to maximize clarity and engagement. Feedback from other stakeholders or interested parties may be solicited prior to launch of the rate, as determined by PURA.

Date Filed: September 03, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Why did the Company choose to not copy the residential heat pump rate offering of its Massachusetts affiliate and provide for the automatic enrollment of all known existing heat pump customers into Rate 6?

Response:

The Company designed its proposed Rate 6 using characteristics of Connecticut-specific residential customers and their associated cost of service. Focusing specifically on the incremental usage anticipated through heat pump conversion, and having the benefit of both an allocated cost of service study ("ACOSS") and a marginal cost of service study ("MCOSS") prepared for this case, the Company has more specific and relevant insight into the costs and basis for setting rates for its residential customers, particularly for its Residential Rate 1 class.

The Company evaluated all components of service and found that the distribution component of service was the relevant component upon which to develop the proposed rate. This structure is designed to be applied on a whole house basis, but targets a share of the load associated with incremental load of newly added heat pumps. The Company is unable to specifically design a rate for only the end use device (i.e., the heat pump). However, block rate structures previously applied for end uses (e.g., water heaters) have been designed into residential rates. A similar concept, but for the incremental load associated with a heat pump, is applied in the design of Rate 6. Redesigning the rate for more efficient pricing of the volumetric rate, in the tail block, while addressing the practical reality of recovering costs on an average basis for usage of the incumbent rate class prior to adding the incremental load, supports more appropriate pricing for incremental load, and addresses the concern of other new, incremental load that may not be distinguishable from heat pump load.

A design that discounts the entire volumetric rate, such as the Massachusetts approach, would apply the discount to usage unrelated to the incremental heat pump load. Rate 6 avoids that outcome by confining the discounted pricing to an incremental block during the winter period, so that usage the customer would have taken in any event continues to be priced under the underlying base rate structure, thereby minimizing the costs that would otherwise be allocated to other customers.

Date Filed: September 03, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Do you agree that, given the proposed increase in the customer charge and the expected increase in annual electric usage for a customer taking service under Rate 6, such customers will significantly increase their contribution to the residential class's proportional allocation of the Company' s fixed delivery costs compared to customers who remain on Rate 1?

Response:

No. Moving more of the fixed component of costs out of the volumetric rate and into the customer charge does not mean that the rate class is contributing more to fixed costs.

Date Filed: September 03, 2026

Witness: Edward A. Davis and Kimberly R. Parsons
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) Why did the Company choose to define the heating season as November through March for Rate 6?

Response:

The months of November through March were selected from a review of the Rate 5 monthly usage profile during the Test Year, whereby a distinguished heating season load characteristic, relative to that of Rate 1, occurred.

Date Filed: August 27, 2026

Witness: Matthew Nelson and Michael Goldman
Request from: Conservation Law Foundation

Question:

(SPACE HEATING RATE) See Exhibit CLP-IAP-1. Please provide copies of any papers, presentations, testimonies (whether pre-filed or delivered live) or opinion pieces prepared by Apex Analytics or, separately, by either Mr. Nelson or Mr. Goldman, within the last five years, on the subject of residential space heating rates and/or rate design, and/or residential heat pumps (including but not limited to heat pump cost, rate design, installation incentives, and tie-in with home energy audit and insulation programs.) If presented as live testimony, please include copies of transcripts of the direct, cross-examination, and redirect examination of the witness or witness panel.

Response:

Please refer to CLF-011, Attachments 1 through 42, for responsive materials prepared by Mr. Nelson, Mr. Goldman, and Apex Analytics, LLC. Apex Analytics is a consulting firm whose practice includes regulatory/rate design work and a substantial energy efficiency engineering practice. Over the past five years, Apex personnel have produced a significant body of work regarding heat pumps, the large majority of which are engineering and program-evaluation materials, studies of heat pump performance, sizing, building integration, and incorporation of heat pumps into energy efficiency plans, rather than heat pump rate design. Mr. Nelson and Mr. Goldman are the primary Apex personnel whose work concerns rates and rate design, while other Apex work is more technical and engineered focused, as described above. The engineering materials were prepared by other Apex staff and are not sponsored by the witnesses. In the interest of completeness, the Company is producing both categories, organized as described in the table below.

All responsive materials from Mr. Nelson and Mr. Goldman are included herein. For other staff, Apex has made a good faith effort to recall and produce all documents responsive to this question; however, given the focus on heat pumps during the requested time period and general staff turnover, Apex cannot guarantee that it located every potentially responsive item.

Attachment	Description
CLF-011 Attachment 1	Community-specific Cost-benefit Evaluation Framework for Beneficial Electrification presentation, co-presented by Apex Analytics on September 27, 2022

CLF-011 Attachment 2	Market Characterization and Assessment Report, co-prepared by Apex Analytics
CLF-011 Attachment 3	Community-specific Cost-benefit Evaluation Framework for Beneficial Electrification presentation, presented by Apex Analytics on October 11, 2022
CLF-011 Attachment 4	Platte River Power Authority Beneficial Buildings Electrification Forecast, submitted by Apex Analytics on March 12, 2022
CLF-011 Attachment 5	Evolving Electrification Policy and Program Design in Pursuit of Decarbonization paper, co-authored by Apex Analytics
CLF-011 Attachment 6	Legislating Heat Pumps: Assessing the costs and carbon savings from a state heat pump standard presentation, co-presented by Apex Analytics on August 4, 2026
CLF-011 Attachment 7	Legislating Heat Pumps: Assessing the costs and carbon savings from a state heat pump standard, co-authored by Apex Analytics
CLF-011 Attachment 8	Keeping the heat on: Assessing the potential for demand side management to alleviate natural gas shortages during extreme cold presentation, co-presented by Apex Analytics on August 4, 2026
CLF-011 Attachment 9	Keeping the heat on: Assessing the potential for demand side management to alleviate natural gas shortages during extreme cold, co-authored by Apex Analytics
CLF-011 Attachment 10	Realpolitik vs Wealth of Notions: Realizing the Benefits of Using Cost-Effectiveness Testing in Building Decarbonization, prepared by Apex Analytics
CLF-011 Attachment 11	Reimagining Quality Installation in Residential Heat Pump Programs: An Analysis of Energy Savings and Value Propositions, co-presented by Apex Analytics on August 5, 2026
CLF-011 Attachment 12	Reimagining Quality Installation in Residential Heat Pump Programs: An Analysis of Energy Savings and Value Propositions, co-authored by Apex Analytics
CLF-011 Attachment 13	Evolving Electrification Policy and Program Design in the Pursuit of Decarbonization, prepared by Apex Analytics
CLF-011 Attachment 14	Don't Freeze! The Heating Electrification Train is Barreling Toward Us?, co-presented by Apex Analytics on November 4, 2022
CLF-011 Attachment 15	Don't Freeze! The Heating Electrification Train is Barreling Toward Us, co-authored by Apex Analytics
CLF-011 Attachment 16	Switch talk on dual fuel heat pump carbon calculations, presentation by Apex Analytics
CLF-011 Attachment 17	The Mountain Energy Project: Non-Pipeline Alternative Report, which the Apex Analytics team performed an NPA Analysis for, in collaboration with other firms

CLF-011 Attachment 18	The Mountain Energy Project: Non-Pipeline Alternative Implementation Plan
CLF-011 Attachment 19	Rebuttal Testimony of Jordan Mann (Apex Analytics) in Colorado proceeding no. 25A-0044EG
CLF-011 Attachment 20	Hearing transcript from Augst 13, 2025 in Colorado proceeding no. 25A-0044EG
CLF-011 Attachment 21	Hearing transcript from Augst 14, 2025 in Colorado proceeding no. 25A-0044EG
CLF-011 Attachment 22	VSHP Deep Dive Research Plan, co-presented by Apex Analytics on March 5, 2026
CLF-011 Attachment 23	Accelerated Adoption of Heat Pump Technology, jointly prepared by the Colorado Energy Office and Apex Analytics
CLF-011 Attachment 24	LinkedIn Article: Decarbonization Journey Part I: Why did I buy the most boring heat pump?
CLF-011 Attachment 25	LinkedIn Article: Decarb Journey Part II, What's the Big Idea?
CLF-011 Attachment 26	LinkedIn Article: Did the Inflation Reduction Act miss an opportunity for a true heat pump revolution?
CLF-011 Attachment 27	LinkedIn Article: Hold up! Keeping your gas furnace might be more environmentally beneficial than you think
CLF-011 Attachment 28	LinkedIn Article: What happens to EE/DSM when it stops being valuable to save electricity most of the time? And what does this mean for heating electrification?
CLF-011 Attachment 29	LinkedIn Article: Where are the methane leaks? And why that's critical for electrification policy.
CLF-011 Attachment 30	Dual Fuel Heat Pump Pilot Phase I Evaluation Report, submitted jointly by Apex Analytics and Ideal Community Strategies
CLF-011 Attachment 31	HVAC Market Actor Profile: Small-to-Medium Commercial HVAC Project Decision Making, prepared in-part by Apex Analytics
CLF-011 Attachment 32	Turning the Wrenches of Beneficial Electrification: Understanding HVAC Contractor Decision-Making, co-authored by Apex Analytics
CLF-011 Attachment 33	Colorado Hybrid Heating Study presentation by Apex Analytics
CLF-011 Attachment 34	Energy Efficiency Strategies Roundtable presentation, co-presented by Apex Analytics
CLF-011 Attachment 35	Direct Testimony and Attachments of Jane L. Colby (Apex Analytics) in the Matter of Atmos Energy Corporation's Application for Approval of its 2024-2028 Clean Heat Plan before the Colorado Public Utilities Commission
CLF-011 Attachment 36	Atmos Energy Colorado Natural Gas Market Potential Study – Clean Heat Plan, submitted by Apex Analytics with Brightline Group

CLF-011 Attachment 37	Direct Testimony and Attachment of Matthew H. Nelson (Apex Analytics) in the Matter of Atmos Energy Corporation's Application for Approval of its 2024-2028 Clean Heat Plan before the Colorado Public Utilities Commission
CLF-011 Attachment 38	Rebuttal Testimony of Matthew H. Nelson (Apex Analytics) in the Matter of Atmos Energy Corporation's Application for Approval of its 2024-2028 Clean Heat Plan before the Colorado Public Utilities Commission
CLF-011 Attachment 39	Renewable Energy World - Transforming utility customer service: Rates, incentives and decarbonization, authored by Michael Goldman (also available at Transforming utility customer service: Rates, incentives and decarbonization)
CLF-011 Attachment 40	Renewable Energy World - Transforming utility customer service: Residential heat pumps can help decarbonization efforts, authored by Michael Goldman (also available at Transforming utility customer service: Residential heat pumps can help decarbonization efforts)
CLF-011 Attachment 41	Renewable Energy World - Transforming utility customer service: Equity in decarbonization, authored by Michael Goldman (also available at Transforming utility customer service: Equity in decarbonization)
CLF-011 Attachment 42	Renewable Energy World - Transforming utility customer service: Helping decarbonize the residential sector, authored by Michael Goldman (also available at Transforming utility customer service: Helping decarbonize the residential sector)