Date Filed: September 08, 2026

**Witness: Jared A. Lawrence, David S. Coco and Timothy W. McGrath**
**Request from: Office of Consumer Counsel**

**Question:**

(CUSTOMER SERVICE) Please refer to the Response to OCC-109, which states that both internal CSRs and Alorica handles customer inquiries regarding "high bill concerns, establishing new service, disconnecting existing service, payment processing…" For all topics for which internal CSRs or Alorica may assist a customer, please explain how the calls are routed to either the internal CSR or to Alorica (i.e., what determines if an Eversource employee or Alorica handles the call?).

**Response:**

The contact center telephony platform is designed for skills-based routing. Customer Service Representatives (CSRs) are assigned skills in the platform based on their knowledge and training. As a customer's call navigates through the self-service system, if the call requires routing to a CSR, the call is assigned a skill per the customer's selection. Once the skill is assigned to the call, the call will exit automation and route to an available CSR.

Specifically, in the case of external and internal CSRs with the same skill, the call will be handled by the CSR who is available the longest (if multiple CSRs are available) or the next CSR to become available if none are available. All CSRs [internal or external] with the same skill are in the pool to be assigned the call and are treated equally by the platform.

Date Filed: September 08, 2026

**Witness: Jared A. Lawrence and Timothy W. McGrath**
**Request from: Office of Consumer Counsel**

**Question:**

(CUSTOMER SERVICE QA) Please refer to the Response to OCC-110.

a. The Response states, "Eversource's internal vendor management team also separately reviews more than one hundred additional, randomly selected Connecticut credit and collections calls handled by the Company's third-party vendor partner…" Please indicate the time frame over which Eversource reviews those 100 calls (i.e., annually? Monthly? Etc…)

b. OCC-110 requested all written policies and procedures regarding quality assurance. The Response summarizes the review process and its attachments contain the call center script, a letter to PURA, and the contract with Alorica. Please confirm that there are no other written policies and procedures regarding the material summarized in the interrogatory response.

**Response:**

a. The Company's internal vendor management team conducts monthly evaluations of more than 100 randomly selected calls.

b. The Company views quality assurance to be an active process arising from rigorous engagement and oversight of both external and internal contributors, as described in the Company's answer to OCC-110. Components of the process are encompassed in the documents provided in response to that question, including the contract with Alorica, which defines the performance levels required by the Company and ramifications for lapses thereof. There is no single document that would or could encompass the Company's viewpoint or engagement on "quality assurance" as a standalone concept as the Company seeks continual improvement on the numerous dimensions of performance involved in the customer-service function.

Regarding the internal employee Quality Assurance Program, please refer to EOE-116 Attachment 1 – which is the company's Behavior Guide, which serves as the set of requirements that CSRs are expected to follow and are measured against to provide the expected customer experience. The program is conduct-based and focuses on four categories: Courtesy, Concern, Timely Resolution and Technical Knowledge. It is not intended to be an all-encompassing script, but rather a guide to help CSRs understand the program and the Company's expectations for customer interactions. Supervisors and quality-assurance team

members periodically calibrate together to review the required CSR conduct. In those calibrations, leadership ensures that the feedback provided is in line with the program guidelines and in the spirit of the intention of the program.

Date Filed: September 15, 2026

**Witness: Jared A. Lawrence and Timothy W. McGrath**
**Request from: Office of Consumer Counsel**

**Question:**

(CUSTOMER SERVICE QA SCORECARD) Please provide all customer service quality assurance scorecards completed from January 1, 2025, through December 31, 2025.

**Response:**

Please refer to OCC-451, Attachment 1 CONFIDENTIAL, which provides an extract of all customer service Quality Assurance Program scorecards completed for both internal and external resources from January 1, 2025, through December 31, 2025.

The Company also provides two samples of Quality Assurance Program scorecards to aid in understanding the provided export and help to visualize the experience of call scorers and Customer Service Representatives ("CSRs") receiving feedback. The form is contained within the telephony platform, utilized by the employees who provide feedback on the calls, and upon completion, provided to the CSRs for viewing. Due to the large quantity of data required, this view of the scorecards could not be provided for every evaluation.

- OCC-451, Attachment 2 CONFIDENTIAL, is the scorecard for the internal Quality Assurance Program.

- OCC-451, Attachment 3 CONFIDENTIAL, is the scorecard for the external Quality Assurance Program.

Alorica, the Company's external Credit and Collections vendor, transitioned to the Company's Quality Assurance platform effective May 2025. Accordingly, the scorecard format for January through April 2025 differs from the format used beginning in May 2025. This data can be found on tab two of OCC-451, Attachment 1 CONFIDENTIAL.

The internal Quality Assurance Program focuses on actionable feedback for CSRs, providing feedback phrases, "Matches Expectations," "Exceeds expectations," and "Falls Short of Expectations," instead of providing an 'evaluation score,' thus this column is blank in OCC-451, Attachment 1 CONFIDENTIAL. The internal program does assign a score through its reporting system, as reported in EOE-117[i], to aid in CSR development over time. For the external Quality Assurance Program, numerical scores are contained in the platform and thus are provided.

**Prior Referenced Response:**

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[i] EOE-117 Question:
(CUSTOMER CALLS-REVIEW) Provide an unlocked Excel spreadsheet detailing the customer calls that the Company has reviewed from January 1, 2025, through December 31, 2025. As part of the information, please provide available details including, but not limited to the CSR, the call date/time, the call type, the review date, internal or external CSR, and the review results.

EOE-117 Response:

The Company provides the excel spreadsheet EOE-117, Attachment 1 CONFIDENTIAL, containing details of reviewed calls for both external and internal Customer Service Representative ("CSRs"). The spreadsheet includes approximately 15,100 total entries.

The spreadsheet contains the following details:
a) Contact ID
b) CSR name
c) Call date
d) Call type
e) Call reviewed date
f) Evaluation score
g) CSR – External/Internal

The Company also clarifies the score format for external and internal CSR evaluation scores differ. External CSR evaluation scores are reflected as a percentage, with each call utilizing a 0 to 100% scoring scale.

In contrast, internal CSR scores are based on a categorization methodology rather than a percentage-based scoring system. The score scale is 1 through 5, with 5 being the top score. The CSR score is generated by scoring four categories and calculating the average of the four categories. Each category can receive either a 1 (falls short of expectations,) a 3 (meets expectations,) or a 5 (exceeds expectations). These category scores are averaged to create an overall score, as shared in the spreadsheet.

Both external and internal CSRs are scored on an average of four (4) calls per month. It is important to note that these calls are not strictly for CL&P customers, as CSRs are also trained to support customers across other operating companies.

Date Filed: September 08, 2026

**Witness: Jared A. Lawrence and Timothy W. McGrath**
**Request from: Office of Consumer Counsel**

**Question:**

(ALORICA) On average, how many calls does Alorica handle per hour?

**Response:**

On average, an Alorica CSR handles 4.8 calls per hour across all types of calls handled in 2025.

Date Filed: September 15, 2026

**Witness: Jessica B. Cain and Daniel M. Traynor**
**Request from: Office of Consumer Counsel**

**Question:**

(LIDR) Please refer to the Response to OCC-114, Attachment 1.

a. Please add columns indicating the total number of customers on each LIDR tier for each month indicated, the number of customers on each LIDR with a life-threatening medical protection designation, and the number of customers eligible for service termination for each LIDR for each month indicated.

b. If current columns d, e, h, k, n, o, and p do not equal the total number of customers on each LIDR tier each month, please explain what additional category of customers is missing and provide (for example, comparing the number of customers indicated in those columns for December 2025 does not equal the total number of customers on LIDR in December 2025 indicated in the Response to OCC-116, Attachment 1).

c. Please separate the customers in Column D by those on MPP, on FPA, and not on a payment arrangement.

**Response:**

a. Please refer to OCC-453, Attachment 1, where three columns are appended to the data submission from OCC-114-RV01, Attachment 1, with the information requested:

- The total number of customers on each LIDR tier for each month indicated (Column X);
- The number of customers on each LIDR with a life-threatening medical protection designation (Column Y); and
- The number of customers eligible for service termination for each LIDR for each month indicated (Column Z)

b. The original data submitted in OCC-114, Attachment 1, was limited to accounts that had *a past due balance*. The original data did *not* include accounts without a past due balance on their account. These are included in the Company's revised submission (OCC-114-RV01,

Attachment 1). One additional column is added to OCC-453, Attachment 1, to include one sub-category of customers, which was not reflected in OCC-114-RV01, Attachment 1:

- (Column AA) "Payment Made *prior* to enrollment or *after* MPP drop". This includes customers who made a payment during the specified month but were not enrolled on the Matching Payment Program ("MPP") for the entire month. For example, customers who made a payment *prior* to the account being enrolled or reinstated into MPP within that month; as well as customers who made a payment *after* the account had been removed from the program.

c. Column D from OCC-114-RV01, Attachment 1, is separated into three columns in OCC-453, Attachment 1:

- Column D: "On Matching Payment Program (MPP)"
- Column E: "On Flexible Payment Arrangement (FPA)"
- Column F: "Not on a Payment Arrangement"

Date Filed: September 08, 2026

**Witness: Christopher E. Colorio and Mark P. Baldwin**
**Request from: Office of Consumer Counsel**

**Question:**

(STORM RESTORATION TIME) Please refer to the Response to OCC-124, Attachment 1. Please confirm that the average restoration time indicated is in minutes.

**Response:**

Confirmed, the average restoration time indicated in OCC-124, Attachment 1, is in minutes.

Date Filed: September 08, 2026

**Witness: Christopher Leigh**
**Request from: Office of Consumer Counsel**

**Question:**

(DATA PRIVACY) Please refer to the OCC-127. The Response does not appear to answer the question posed. If Conn. Gen. Stat. § 36a-701b were amended to include utility account information within the scope of "personal information" under the statute, indicate the costs and system changes necessary for the Company to comply with the revised statute. If no system changes are necessary to comply with the statute, please state so.

**Response:**

If customer account information were subject to the data privacy rules of General Statutes § 36a-701b (i.e., if utility account information were included within the definition of "personal information" in § 36a-701b(a)), that would necessitate an assessment to determine what changes in business practices and security controls would be necessary. This assessment would examine the related costs and investment of time, resources and personnel to implement any required system changes to ensure compliance. Eversource is not able to speculate as to the costs, business processes and system changes that would be needed to comply with the changes in the law until such changes in the law are enacted.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Residential Customer Charge) Refer to Exhibit CLP-RATES-1, at 16, which states that the Company has "applied the method established in Docket No. 17-01-12 and further employed in its last rate case in determining a new, proposed Residential Rate 1 customer charges."

a. Please provide a copy of the document detailing the referenced methodology.
b. Explain, in narrative format, the steps taken by the Company in this rate case to calculate the maximum residential customer charge (MRCC). For each step, provide the relevant page number, columns, rows, and or cells under Exhibit CLP-RATES-2.13.

**Response:**

a. Details of the methodology established in Docket No 17-01-12 are available in the Final Decision issued December 20, 2017.[1]

b. The Company used the Rate Year Cost of Service Study ("COSS") (filed as Exhibit CLP-ACOS-2) as the basis to calculate the Rate Year MRCC, as presented in the schedules provided by the Revenue Requirements Panel in this docket.

   The Company used the percentages from the Rate Year COSS to first determine the appropriate level of costs to be allocated to the Residential Rate 1 and Rate 7 customers.

   Once the amounts allocated to Rate 1 and Rate 7 were determined, the Company then examined which accounts were to be excluded from the MRCC calculation.

   For those remaining accounts included in the MRCC calculation, the Company then determined which accounts could be directly assigned to one of the four, so-called allowable functions pursuant to the decision in the MRCC docket: 1. Metering; 2. Billing; 3. Service Connections; and 4. Customer Service. For those accounts where direct assignment was not possible, the Company used allocations that were created based on expense and rate base accounts that were consistent with the costs that are eligible for inclusion in the calculation of the MRCC. For example, the MRCC Distribution plant allocation factor was calculated by including only the Services and Meters gross plant

[1] https://www.dpuc.state.ct.us/2nddockcurr.nsf/8e6fc37a54110e3e852576190052b64d/de3ad5d85478b85f852587520077b457?OpenDocument

accounts which decreased the total amount that was allocated to the customer component. Therefore, any accounts using that allocator were accordingly adjusted downward.

Lastly, because many accounts use the Overhead ("O_LABOR") allocator, the Company examined each Cost Control Center ("CCC") to determine the labor included in the CCCs that was directly related to the four allowable functions. The support for the revised labor amounts is included in Exhibit CLP-RATES-2.13, at pages 17-19.

Date Filed: September 15, 2026

**Witness: Edward A. Davis, Kimberly R. Parsons, Matthew Nelson and Michael Goldman**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Please explain the Company's rationale for proposing an EDR Rider in this rate case. For example, is the primary purpose of the EDR Rider to support Connecticut's state policy goals related to economic development, put downward pressure on rates for the Company's other ratepayers, provide revenue stability for the Company, or something else?

**Response:**

The Company is proposing an Economic Development Rate Rider ("EDR Rider") in this rate case because of the beneficial economics of such a rate and its potential positive impact on affordability

A primary purpose of the EDR Rider is to improve affordability. Bringing new, incremental electric load online would be expected to help put downward pressure on rates by providing more variable units over which to spread fixed costs. From a rate perspective, this can be achieved when the economic development rate is set above the marginal cost to serve the new load. The Company considers the results from its most recent marginal cost study as a basis on which to help set the economic development rate so that it would have the intended positive affordability impacts.

The Company believes that it is possible to achieve multiple objectives with an EDR Rider. In addition to helping promote customer affordability, the EDR Rider is intended to help spur economic development in the state. Attracting new load can have the beneficial economic impact of job creation, increased capital investment, and higher tax revenue for the state.

Date Filed: September 15, 2026

**Witness: Edward A. Davis, Kimberly R. Parsons, Matthew Nelson and Michael Goldman**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 23, which states that "a schedule of discounted rates would be determined on a customer-specific basis," and at 28, which states that the Company's proposed approach would avoid "administrative complexity associated with variable or negotiated discounts."

a. Please reconcile these two statements.
b. Clarify which components of the EDR would be customer-specific, and which components would be consistent across different EDR customers.
c. Has it previously been the practice of the Company to negotiate discounts with customers on an individual basis? If so, does the EDR mirror the structure of those discounts? If not, why did the Company propose to change the structure?

**Response:**

a. The intended approach combines boundaries that provide structure with room for customer-specific decisions. This allows for reduced administrative complexity while acknowledging that there are unique customer situations. The Company expects to establish specific discounts within the time frame that are above marginal cost of service for that customer. This approach will include a specific schedule providing guidelines and boundaries within which to work in developing a discount.

b. The overarching rate structure is assumed to be the same for all customers within a given class, and discounts or other adjustments under the EDR would be made relative to such rates, for incremental, new load. The primary focus is on discounts to the distribution component of service, and any other component that can be demonstrated to provide a positive net benefit to all customers, justifiable and allowable within the context of such component. The characteristics, cost of providing service and nature of service and unique circumstances of an individual customers provide the basis for determining the type and extent of rate discount that may be applied, and the extent in additional revenue that can be credited to and demonstrated to be a benefit to all customers. Evaluation for an individual customer to design and verify benefits would occur initially and on an ongoing basis (e.g., annually).

c. Yes, it has previously been the practice of the Company to negotiate discounts with customers on an individual basis, particularly where actual customer cost to serve and unique characteristics of that customer need to be evaluated. Customer specific details including determination of the incremental load to which the EDR applies, level and schedule of discounts, and other parameters are set forth in individual customer service agreements.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 28, which states that the EDR discount would be "anchored to the Company's marginal cost of service."

a. Please explain the methodology for calculating this cost on a per-customer basis. Provide any associated workpapers in live Excel format with all formulas intact.
b. How often does the Company plan to conduct this calculation or other analysis to confirm that revenues collected from each EDR customer are sufficient to recover their incremental cost of service?

**Response:**

a. As a working proposition, the Company has conducted and provided as part of its filing, a marginal distribution cost study, which provides several components of marginal distribution costs that, at a system level, can inform the marginal distribution costs of customers within each service class (e.g., large C&I). When individual customer load growth or new service connections are evaluated, the Company would conduct a customer-specific analysis of service requirements and costs, including for upgrades and service interconnection requirements. Both local facilities (e.g., service transformers, services, switchgear) and system level costs (e.g., circuits, substations) are evaluated and where capital costs may be incurred, a contribution in aid of construction and rate revenue sufficiency analysis would be performed. The expected revenue from Distribution rates becomes part of this evaluation, and discounts from otherwise applicable rates that are above marginal costs can have an impact, as it relates to such individual customer revenues (i.e., on a per customer basis, for such customer).

b. Such calculation or analysis would conceivably be performed any time the need to serve incremental or new load is evaluated. The impact of potential discounted rates would be a factor in these analyses.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Has the Company received communications from industrial customers expressing interest in the EDR? If so, provide the industry type of these customers and the total incremental load the Company expects from them.

**Response:**

The Company has had discussions with several large general service rate customers (e.g., customers whose load might qualify for service under Rate 57, Rate 58 or Rate 39) and with Connecticut Industrial Energy Consumers ("CIEC") regarding prospective potential needs for an EDR. The Company has typically not discussed specific incremental load requirements and does not have a total, expected incremental load.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Did the Company consult any industrial customers on the structure of the proposed EDR? If so, provide a summary of any feedback the Company received from those customers, and whether and how the Company incorporated that feedback into its proposal.

**Response:**

As noted in the Company's response to information request OCC-460[i], the Company has communicated with customers, which included industrial customers, and the Connecticut Industrial Energy Consumers ("CIEC") regarding an Economic Development Rate ("EDR"). Such communications focused predominantly on a discussion of:

- Whether a tariff (i.e., EDR) or special contract approach would apply;
- Overall structures including types of load that might qualify and which components of service would be proposed to be subject to EDR treatment (including, for example, which rate components might be affected and whether a discounted rate approach might apply);
- The period of time and duration a discount might apply;
- The form of discount, such as declining or constant discount; and
- The extent to which only incremental or new load would be eligible vs. existing load and/or load considered for business retention purposes.

Customers raised the point that many of these considerations were addressed with regard to desired structures of an EDR, in a recent UI rate case. In consideration of this input, the Company reflected in its proposed EDR a framework that gives structure from which to further address these and other considerations. In particular, the proposed EDR contemplates eligibility for only new and incremental load; a defined term (5 years) and declining discount schedule, focused on rates for Distribution service; and a targeted discount approach based on a more focused, customer-specific analysis, as discussed in the approach and processes principles that would apply as illustrated in the response to OCC-459[ii]. The Company was unable to more deeply vet additional input in developing its proposed EDR. As indicated in prefiled testimony, the Company presents its

proposed EDR as preliminary and potentially subject to further development, and is open to additional engagement through this proceeding to further define and build out the framework and general provisions of its EDR during this proceeding.

**Prior Referenced Response:**

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[i] OCC-460 Question:

(Economic Development Rate Rider) Has the Company received communications from industrial customers expressing interest in the EDR? If so, provide the industry type of these customers and the total incremental load the Company expects from them.

OCC-460 Response:

The Company has had discussions with several large general service rate customers (e.g., customers whose load might qualify for service under Rate 57, Rate 58 or Rate 39) and with Connecticut Industrial Energy Consumers ("CIEC") regarding prospective potential needs for an EDR. The Company has typically not discussed specific incremental load requirements and does not have a total, expected incremental load.

[ii] OCC-459 Question:
(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 28, which states that the EDR discount would be "anchored to the Company's marginal cost of service."

a. Please explain the methodology for calculating this cost on a per-customer basis. Provide any associated workpapers in live Excel format with all formulas intact.

b. How often does the Company plan to conduct this calculation or other analysis to confirm that revenues collected from each EDR customer are sufficient to recover their incremental cost of service?

OCC-459 Response:

a. As a working proposition, the Company has conducted and provided as part of its filing, a marginal distribution cost study, which provides several components of marginal distribution costs that, at a system level, can inform the marginal distribution costs of customers within each service class (e.g., large C&I). When individual customer load growth or new service connections are evaluated, the Company would conduct a customer-specific analysis of service requirements and costs, including for upgrades and service interconnection requirements. Both local facilities (e.g., service transformers, services, switchgear) and system level costs (e.g., circuits, substations) are evaluated and where capital costs may be incurred, a contribution in aid of construction and rate revenue sufficiency analysis would be performed. The expected revenue from Distribution rates becomes part of this evaluation, and discounts from otherwise applicable rates that are above marginal costs can have an impact, as it relates to such individual customer revenues (i.e., on a per customer basis, for such customer).

b. Such calculation or analysis would conceivably be performed any time the need to serve incremental or new load is evaluated. The impact of potential discounted rates would be a factor in these analyses.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-1, at 28, where the Company proposes "a declining, time-limited discount applied to incremental load over a five-year term, consistent with the declining structure proposed in the Company's prior economic development rate."

a.Please provide the structure of the discount under the Company's prior EDR.

b.Did the Company consider other participation term durations? If so, provide the alternatives the Company considered and explain why each alternative was ruled out. If not, why not?

**Response:**

a. Please refer to OCC-462, Attachment 1.

b. The Company considered longer-term EDR periods (e.g., previously offered long-term EDR riders had terms of up to 10 years). Such riders had extensively negotiated terms and applied to bundled rate structures, and were more expansive and relevant for the period in which individual service agreements were applied (e.g., prior to restructuring where bundled rates and services applied, and often involved business retention and distribution generation alternatives evaluated over the longer term structure). As a working proposition the Company is focusing on a shorter, 5-year period within which to provide EDR benefits to individual customers, under current rate structures.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Please provide the tariff for the Company's prior EDR. Highlight any differences between the prior EDR and the EDR proposed in this rate case and provide the rationale for each difference.

**Response:**

Please refer to OCC-463, Attachment 1, which provides a version of the filed EDR marked "preliminary", with tracked changes showing detailed changes relative to the prior EDR that was withdrawn.

The following provides a highlight of differences reflected in the attachment. The proposed tariff maintains the same form of tariff (a rider applicable to service under a general service rate, with comparable provisions regarding availability, qualification, rate provisions and other terms and conditions of service). The rate section maintains the same overall 5-year duration but allows for discounts to be specified for specific charges (e.g., demand and/or energy charges for distribution service) in a service agreement, rather than at prescribed levels applicable to total, bundled demand and energy charges. The references to restructuring legislation and timing impacts, along with link to company owned generation capacity, relevant to unbundling and timing of restructuring impacts have been removed. A provision for PURA approval pursuant to a service agreement has been added. References and terminology have been updated in sections 1.-7., while submetering provisions have been removed under the Conditions section, and the threshold load requirement has been increased under the Qualifications provisions. Availability has been updated to focus on larger customers (e.g., those on Rate 57 and 58), while the issues of flex rider bundled rates and implicit in bundled rates upon which flex rate rider discounts were determined have been resolved, eliminating the need for third party supply provisions.

Date Filed: September 15, 2026

**Witness: Edward A. Davis, Kimberly R. Parsons, Matthew Nelson and Michael Goldman**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Please clarify whether the following customer types would be able to qualify for the proposed EDR:

a. Customers with large-scale computational loads (i.e., data center);
b. Customers connected to the transmission system;
c. Customers switching from natural gas to electricity, such as for process heating load.

**Response:**

a. Customers with large-scale computational loads (i.e., data centers) are not categorically excluded from the Economic Development Rate ("EDR"), nor are they categorically eligible. Any customer seeking to participate in the EDR will be evaluated to determine if they meet the requirements to qualify for service under the EDR and to ensure that their participation continues to provide affordability benefits to customers. Part of future considerations would be whether a specific rate for data centers makes sense or whether it may be beneficial to consider customer-specific characteristics when determining rates for potential data center customers. The load must be new or incremental, the incremental distribution revenue must exceed the incremental cost to serve, the discount is subject to the cap tied to incremental distribution revenue, and the customer remains responsible for interconnection and system upgrade costs.

   As previously noted in OCC-465, there are currently no active requests or firm commitments for data center load on the Company's distribution system. The Company recognizes that large computational loads raise broader policy questions, and if there are future requests for data centers to take service from the Company, the Company would work closely with the state on potential rates specific to large-scale computational loads. Understanding that there are larger policy implications associated with data centers, the Company believes it is best to carefully deliberate, with input from the relevant state agencies and stakeholders, on how to determine a rate for data centers that is mutually beneficial for the state, the interconnecting customer, and the Company, and ensures that existing customers are not harmed.

b. The EDR discount applies to charges for the Distribution component of service (Exhibit CLP-RATES-1, at 30). Customers connected at the transmission voltage take minimal distribution service, and the EDR therefore may have little practical applicability to such customers. The Company has not proposed discounts to transmission, supply, or public benefits components of service, and transmission service to such customers would continue under otherwise applicable retail rates.

c. Customers switching from natural gas to electricity, such as for process heating load, may be eligible for this rate but would be evaluated on a case-by-case basis if the load is new or incremental and the customer satisfies all other requirements of the rider. Fuel switching may be an appropriate criterion to evaluate for consideration in discounted distribution rates, and is one potential scenario where the customer may be bringing new, incremental electric load to the system and would be applied to a fuel-switching customer on the same basis as any other applicant. Note that the primary evaluation contemplated in the proposed EDR is on the distribution service requirement and corresponding cost to provide such service.

Date Filed: September 08, 2026

**Witness: Edward A. Davis, Kimberly R. Parsons and Gerhard Walker**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Please provide the anticipated capacity of data center load additions in the Company's service territory each year for the next 10 years.

a. Provide separate estimates for load requests and firm commitments.
b. Provide any analysis the Company has conducted on the extent to which the anticipated data center load impacts system costs and customer bills. Include associated workpapers in live Excel format with all formulas intact.

**Response:**

a. There are currently no active requests or firm commitments for data center load additions within the Company's distribution system.

   With regards to "Requests," while Eversource does record requests for future customer connected loads, these include significant speculative inquiries by customers, the Company does not include them in any forecasts for substation capacity needs and has not budgeted any funds in direct support of these projects until a signed workorder is in-hand and design deposits have been made. Based on the Company's historical experience many of these projects fail to materialize and, to avoid unnecessary costs and inefficiency, the Company does not dedicate or plan capacity for these projects until such time as a firm commitment is received from the customer.

   Requests or firm commitments for data center load additions within the transmission system are excluded.

b. This is not applicable as there are currently no active requests or firm commitments for data center load additions within the Company's distribution system. Such calculations are not feasible until the project specifics are known, including costs to interconnect and revenue credits -- all off which are highly dependent on a given project.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-3, at 199, which provides that "The Customer shall begin and/or continue implementation of cost-effective conservation (i.e., energy efficiency) and load management measures and programs, as determined appropriate by the Company."

a. Please describe how the company will manage the customer incentive to increase load under the EDR to avoid a conflict with existing energy efficiency and load management objectives.

b. Has the Company considered retroactively adjusting the base period usage of a customer after that customer implemented efficiency improvements? If so, elaborate on how the Company will make this adjustment. If not, why not?

**Response:**

a. This provision is carried in from the prior version of the EDR. The Company expects that implementation of such measures and program participation will be managed using current practices. Customers on the EDR will be required to participate and contribute to the C&LM fund along with all other customers. The C&LM incentives that are provided to customers for installing C&LM measures are commensurate with the system benefits. The proposed EDR would not provide incentives to customers to install energy efficient measures.

b. Pursuant to part a., current practices and customer specific evaluations would inform whether such adjustment would be applied.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Economic Development Rate Rider) Refer to Exhibit CLP-RATES-3, at 199, which discusses a process of normalizing base period usage and removing abnormalities to calculate the customer's Incremental Load. Please provide a detailed description of this process, including any associated workpapers in live Excel format with all formulas intact.

**Response:**

A detailed process for purposes of the EDR has not been developed. The Company expects, however, that such process will adopt similar, appropriate current methods to set such a base line using historical and projected base usage as may adjusted relative to new or incremental load. The practices for evaluating baseline loads for load interruption, and that of customer incremental load under the Company's CTA exemption for incremental load are among the methods expected to be relied upon to support such baseline relative to determination of Incremental Load.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 37, which states that Rate 6 is designed to "ensure no incremental harm to remaining customer classes." Please explain how the Company determined that Rate 6 would cause no incremental harm to the remaining residential customer class (Rate 1), including any quantitative analysis supporting that conclusion. Include any associated workpapers in live Excel format with all formulas intact.

**Response:**

Please refer to the Company's response to OCC-469[i].

**Prior Referenced Response:**

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[i] OCC-469 Question:

(Rate 6 – Residential Space Heating Rate) Please explain whether Rate 6 was designed to be revenue-neutral on a standalone basis, assuming no load shifting and a range of enrollment scenarios. If so, provide the revenue sufficiency analysis and workpapers, including assumptions regarding enrollment levels and per-customer incremental usage, in live Excel format with all formulas intact.

OCC-469 Response:

Please see the Company's responses to information request OCC-474[i], OCC-475[i], and OCC-476[i]. The proposed Distribution rate design involved the following elements: a winter period charge for incremental distribution usage set at the year-round marginal unit cost, marked up proportionately against the total average cost for Rate 1, such that the Winter Period incremental rate ensures that customers will contribute to additional recovery of existing costs, i.e.., beyond incremental costs; an increase in the customer charge relative to the residential Rate 1 fixed charge, and a redesign of tier 1 volumetric rate for service. Reconciliation with total approved Distribution revenues occurs through revenue decoupling. Given the average usage bright line between block 1 and block 2 pricing of 700 kWh, the differences between actual and such average usage will determine the individual customer contribution. Projected Rate 6 enrollment levels and individual or average per-customer incremental usage are not known. Please refer to Exhibit CLP-RATES-6, at page 2, for design kWh and customer counts associated with the base revenue requirement and rate design, along with the details of design for any incremental usage. Exhibit CLP-RATES-6, at page 3 of provides details and illustrates bill impacts for assumed incremental load. The Company does not propose modifications to rates for other components of service (i.e., transmission, public benefits or supply rates), as those rates provide either an annual reconciliation or are set directly based on price (supply).

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Please explain whether Rate 6 was designed to be revenue-neutral on a standalone basis, assuming no load shifting and a range of enrollment scenarios. If so, provide the revenue sufficiency analysis and workpapers, including assumptions regarding enrollment levels and per-customer incremental usage, in live Excel format with all formulas intact.

**Response:**

Please see the Company's responses to information requests OCC-474[i], OCC-475[ii], and OCC-476[iii]. The proposed Distribution rate design involved the following elements: a winter period charge for incremental distribution usage set at the year-round marginal unit cost, marked up proportionately against the total average cost for Rate 1, such that the Winter Period incremental rate ensures that customers will contribute to additional recovery of existing costs, i.e.., beyond incremental costs; an increase in the customer charge relative to the residential Rate 1 fixed charge, and a redesign of tier 1 volumetric rate for service. Reconciliation with total approved Distribution revenues occurs through revenue decoupling. Given the average usage bright line between block 1 and block 2 pricing of 700 kWh, the differences between actual and such average usage will determine the individual customer contribution. Projected Rate 6 enrollment levels and individual or average per-customer incremental usage are not known. Please refer to Exhibit CLP-RATES-6, at page 2, for design kWh and customer counts associated with the base revenue requirement and rate design, along with the details of design for any incremental usage. Exhibit CLP-RATES-6, at page 3 of provides details and illustrates bill impacts for assumed incremental load. The Company does not propose modifications to rates for other components of service (i.e., transmission, public benefits or supply rates), as those rates provide either an annual reconciliation or are set directly based on price (supply).

**Prior Referenced Responses:**

[i] OCC-474 Question:

(Rate 6 – Residential Space Heating Rate) Please explain how the two volumetric discount levels (4.7 cents/kWh for heating season usage above 700 kWh and 2.8 cents/kWh for all other usage) were derived. Specifically:

a. Were the discounts calibrated to the incremental cost of serving heat pump load? If so, please provide the calculation and workpapers in live Excel format with all formulas intact. If not, why not?
b. Did the Company consider other discount levels? If so, explain the alternatives considered and why they were ruled out. If not, why not?

OCC-474 Response:

a. Please refer to Exhibit CLP-RATES-6, at page 2. An Excel version of that exhibit was provided as part of the Company's filing. Costs and the associated proposed incremental load rate is calibrated with the marginal cost of providing service, as detailed on page 2 of the exhibit.

b. Please note, the Company did not develop the 2.8 cents/kWh rate as a discount from the 4.7 cents/kWh rate, so no other level of discount was considered. Rather, the Winter Block 2 Rate is based on the marginal cost of service and reconciling adjustments that allocate a proportional share of the corresponding volumetric rate, as detailed in Exhibit CLP-RATES-6, at page 2.

[ii] OCC-475 Question:

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 35-36, which acknowledges that incremental load from EV charging can also benefit from the Rate 6 discount for usage above 700 kWh.

a. Was the discount sized to account for this "free rider" effect? If so, how? If not, why not?
b. What percentage of Rate 6 enrollees does the Company expect to also have EV charging load?
c. Has the Company modeled the revenue impact if a significant share of Rate 6 bill savings is attributable to EV charging rather than heat pump load? If so, provide the associated workpapers in live Excel format with all formulas intact. If not, why not?

OCC-475 Response:

a. Yes. The Winter Block 2 rate for Rate 6 is based on marginal distribution costs and a reconciling adjustment that effectively marks up the rate on an average load basis to ensure an additional share of demand related distribution costs are charged to incremental load (PLEASE refer to the Company's response to OCC-474[ii]). As a prerequisite to the rate, a customer must add new heat pump load not already included in the underlying revenue requirement applied in the rate design for Rate 1. By moving fixed cost recovery into the customer charge and the "tier 1" volumetric rates for Distribution, the Winter Block 2 rate that applies to incremental load, whether primarily for the heat pump load or secondarily any other incremental load, we are pricing that block based on, but above marginal cost to ensure positive contribution to distribution costs. Pricing for other components of service including transmission, public benefits and supply are unchanged relative to Rate 1. This helps mitigate the free rider effect.

b. The Company does not have such an estimate.

c. The Company has not conducted such an analysis. The workpapers provided in Exhibit CLP-RATES-6 may be utilized to estimate bill impacts for various levels of usage, which may be assumed to include incremental heat pump and EV charging load.

[iii] OCC-476 Question:

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 36, which states that "additional EV charging during winter months can benefit from and contribute to system efficiency while receiving the benefit of reduced costs reflective of the heating season."

a. If the Company believes that EV charging load can provide the same system benefits as heat pump load during winter months, why did the Company not propose that EV charging customers without heat pumps be eligible for Rate 6?
b. Explain whether the Company believes that it is reasonable, from a cost causation and revenue neutrality perspective, for EV charging load to receive a discount during the winter without having to pay higher rates in the summer.

OCC-476 Response:

a. Rate 6 is designed for incremental winter load associated with adding a heat pump. However, the Company has no way of specifically identifying or differentiating such incremental heat pump load from other incremental load. Moreover, as with other residential rates this design is predicated on annual revenue requirements and average rates, that apply to whole house service. The design of Rate 6 is structured to ensure that the rate applies to the relevant period and includes the incremental load of the heat pump operating during the winter period, and increased system utilization may occur. The primary focus of this rate design is on space heating, and the comparative load that informs characteristics of this incremental load (i.e., that associated with electric space heating, not EV's) is a comparison of Rate 5 vs. Rate 1 monthly usage.

b. On balance the proposal provides a Distribution rate that can support incremental load during the winter period beyond that of heat pumps operating in a heating mode. This rate is not predicated on achieving an overall annual average rate that, due to a reduction in the rate for one period, an offsetting higher rate is required in another period. To ensure revenue neutrality with load across all months prior to consideration of any load increase in the targeted winter period, the proposed design moves a significant share of cost recovery, into the customer charge and the block 1 rate. This facilitates pricing for the incremental load using marginal costs, as fully detailed in Exhibit CLP-RATES 6.

   It is important to note that comparative load shapes of Rate 1 and Rate 5 indicate that both classes have increased electric load in the summer compared with the average, and while it hasn't been evaluated, the incremental load during the summer associated with a new heat pump added for electric space heating may already be represented in the summer load characteristics of Rate 1, with no incremental impact to cost of service or average distribution rates. Adding an EV load during the summer would represent an incremental load, and may drive additional costs relative to cooling loads already reflected in such rates. The Rate 7 time-of-day structure offers price signals whereby rates for incremental EV charging load during the summer would be expected to be lower during off-peak periods, and would therefore provide incentive to charge during the off peak and avoid causing additional costs. Given the nature of the Rate 6 design, the Company did not evaluate redesigning rates applicable to the summer period.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 32, which states that Rate 6 will be available to residential customers who currently heat with a delivered fuel heating system. Please clarify whether residential customers with gas heating will be eligible for Rate 6? If not, why not?

**Response:**

Please refer to the Company's response to information request CLF-002[i] for the requested information.

**Prior Referenced Response:**

[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.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 33, which indicates that Rate 6 customers will receive a distribution energy rate 4.7 cents/kWh lower than Rate 1 for heating season usage above 700 kWh, and 2.8 centers/kWh lower during all other hours. Please provide the revenue impact calculation underlying these discount amounts by season and usage tier, including any sensitivity analysis across different enrollment and load scenarios.

**Response:**

As this rate is not in effect, there are no customers enrolled to perform such impacts. The design and changes to volumetric rates and customer charges rates are based on the same distribution revenue requirement. The typical bills and comparison of bills for the distribution portion of service under Rate 1, and Rate 6, across a range of monthly usage levels are provided in Exhibit CLP-RATES-6, page 3 of 3.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) In addition to Exhibit CLP-RATES-6, please provide illustrative bill comparisons for a range of Rate 6 customer types (partial displacement, full displacement, customers with EVs also enrolled) versus a comparable Rate 1 customer and Rate 7 customer, showing monthly net revenue contributions to the distribution system per customer type.

**Response:**

The Company does not have illustrative usage levels for such customer types, but for whatever level of assumed monthly kWh usage to be compared that may be assumed to reflect any of these customer types, the bill comparisons for distribution service as provided in Exhibit CLP-RATES-6, page 3, illustrates the comparison of Rate 6 vs. Rate 1, and the bill comparisons at various usage levels can be made by comparing the Rate 1 and Rate 7 typical bills, provided in Exhibit CLP RATES-2.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 23-24. Please state whether the Revenue Decoupling Mechanism is designed to capture any revenue shortfall arising from Rate 6 enrollment diluting Rate 1 revenues. If so, explain how Rate 6-driven revenue loss will be treated under the RDM and which customer classes ultimately bear that cost.

**Response:**

The Revenue Decoupling mechanism is designed to reconcile differences in aggregated (i.e.,. total) actual vs. targeted revenues, and not specifically to capture such revenue shortfall that may occur. While the question does not define or explain what is meant by diluted revenues, if the context of an assumed difference in revenue is due to the migration of Rate 1 customers to Rate 6, such migration may in a given month result in higher revenue for first block kWh sales, and lower revenue for second block kWh sales, which potentially include both kWh sales that would otherwise have been charged under Rate 1 and kWh sales associated with incremental, new heat pump load. The Company does not agree that Rate 6 enrollment which reflects increased kWh sales would reduce overall revenue compared with revenue under Rate 1 which would exclude such increased kWh sales.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Please explain how the two volumetric discount levels (4.7 cents/kWh for heating season usage above 700 kWh and 2.8 cents/kWh for all other usage) were derived. Specifically:

a. Were the discounts calibrated to the incremental cost of serving heat pump load? If so, please provide the calculation and workpapers in live Excel format with all formulas intact. If not, why not?
b. Did the Company consider other discount levels? If so, explain the alternatives considered and why they were ruled out. If not, why not?

**Response:**

a. Please refer to Exhibit CLP-RATES-6, at page 2. An Excel version of that exhibit was provided as part of the Company's filing. Costs and the associated proposed incremental load rate is calibrated with the marginal cost of providing service, as detailed on page 2 of the exhibit.

b. Please note, the Company did not develop the 2.8 cents/kWh rate as a discount from the 4.7 cents/kWh rate, so no other level of discount was considered. Rather, the Winter Block 2 Rate is based on the marginal cost of service and reconciling adjustments that allocate a proportional share of the corresponding volumetric rate, as detailed in Exhibit CLP-RATES-6, at page 2.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 35-36, which acknowledges that incremental load from EV charging can also benefit from the Rate 6 discount for usage above 700 kWh.

a. Was the discount sized to account for this "free rider" effect? If so, how? If not, why not?
b. What percentage of Rate 6 enrollees does the Company expect to also have EV charging load?
c. Has the Company modeled the revenue impact if a significant share of Rate 6 bill savings is attributable to EV charging rather than heat pump load? If so, provide the associated workpapers in live Excel format with all formulas intact. If not, why not?

**Response:**

a. Yes. The Winter Block 2 rate for Rate 6 is based on marginal distribution costs and a reconciling adjustment that effectively marks up the rate on an average load basis to ensure an additional share of demand related distribution costs are charged to incremental load (please refer to the Company's response to OCC-474[i]). As a prerequisite to the rate, a customer must add new heat pump load not already included in the underlying revenue requirement applied in the rate design for Rate 1. By moving fixed cost recovery into the customer charge and the "tier 1" volumetric rates for Distribution, the Winter Block 2 rate that applies to incremental load, whether primarily for the heat pump load or secondarily any other incremental load, we are pricing that block based on, but above marginal cost to ensure positive contribution to distribution costs. Pricing for other components of service including transmission, public benefits and supply are unchanged relative to Rate 1. This helps mitigate the free rider effect.

b. The Company does not have such an estimate.

c. The Company has not conducted such an analysis. The workpapers provided in Exhibit CLP-RATES-6 may be utilized to estimate bill impacts for various levels of usage, which may be assumed to include incremental heat pump and EV charging load.

**Prior Referenced Response:**

[i] OCC-474 Question:

(Rate 6 – Residential Space Heating Rate) Please explain how the two volumetric discount levels (4.7 cents/kWh for heating season usage above 700 kWh and 2.8 cents/kWh for all other usage) were derived. Specifically:

a. Were the discounts calibrated to the incremental cost of serving heat pump load? If so, please provide the calculation and workpapers in live Excel format with all formulas intact. If not, why not?
b. Did the Company consider other discount levels? If so, explain the alternatives considered and why they were ruled out. If not, why not?

OCC-474 Response:

a. Please refer to Exhibit CLP-RATES-6, at page 2. An Excel version of that exhibit was provided as part of the Company's filing. Costs and the associated proposed incremental load rate is calibrated with the marginal cost of providing service, as detailed on page 2 of the exhibit.

b. Please note, the Company did not develop the 2.8 cents/kWh rate as a discount from the 4.7 cents/kWh rate, so no other level of discount was considered. Rather, the Winter Block 2 Rate is based on the marginal cost of service and reconciling adjustments that allocate a proportional share of the corresponding volumetric rate, as detailed in Exhibit CLP-RATES-6, at page 2.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 36, which states that "additional EV charging during winter months can benefit from and contribute to system efficiency while receiving the benefit of reduced costs reflective of the heating season."

a. If the Company believes that EV charging load can provide the same system benefits as heat pump load during winter months, why did the Company not propose that EV charging customers without heat pumps be eligible for Rate 6?
b. Explain whether the Company believes that it is reasonable, from a cost causation and revenue neutrality perspective, for EV charging load to receive a discount during the winter without having to pay higher rates in the summer.

**Response:**

a. Rate 6 is designed for incremental winter load associated with adding a heat pump. However, the Company has no way of specifically identifying or differentiating such incremental heat pump load from other incremental load. Moreover, as with other residential rates this design is predicated on annual revenue requirements and average rates, that apply to whole house service. The design of Rate 6 is structured to ensure that the rate applies to the relevant period and includes the incremental load of the heat pump operating during the winter period, and increased system utilization may occur. The primary focus of this rate design is on space heating, and the comparative load that informs characteristics of this incremental load (i.e., that associated with electric space heating, not EV's) is a comparison of Rate 5 vs. Rate 1 monthly usage.

b. On balance the proposal provides a Distribution rate that can support incremental load during the winter period beyond that of heat pumps operating in a heating mode. This rate is not predicated on achieving an overall annual average rate that, due to a reduction in the rate for one period, an offsetting higher rate is required in another period. To ensure revenue neutrality with load across all months prior to consideration of any load increase in the targeted winter period, the proposed design moves a significant share of cost recovery, into the customer charge and the block 1 rate. This facilitates pricing for the incremental load using marginal costs, as fully detailed in Exhibit CLP-RATES 6.

It is important to note that comparative load shapes of Rate 1 and Rate 5 indicate that both classes have increased electric load in the summer compared with the average, and while it hasn't been evaluated, the incremental load during the summer associated with a new heat pump added for electric space heating may already be represented in the summer load characteristics of Rate 1, with no incremental impact to cost of service or average distribution rates. Adding an EV load during the summer would represent an incremental load, and may drive additional costs relative to cooling loads already reflected in such rates. The Rate 7 time-of-day structure offers price signals whereby rates for incremental EV charging load during the summer would be expected to be lower during off-peak periods, and would therefore provide incentive to charge during the off peak and avoid causing additional costs. Given the nature of the Rate 6 design, the Company did not evaluate redesigning rates applicable to the summer period.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-6, which shows that the Rate 6 customer charge is $30.95/month, in contrast to the Rate 1 customer charge of $12.36/month. Please explain how the differences in volumetric and customer charges between Rate 1 and Rate 6 were determined and whether the higher customer charge on Rate 6 was designed to offset the volumetric discount on a revenue-neutral basis. Provide the associated workpapers in live Excel format with all formulas intact.

**Response:**

Please refer to Exhibit CLP-RATES-6, at pages 2-3, for details of both the development of the Rate 6 customer charge and volumetric rates and differences between those and their Rate 1 counterparts.

The disaggregation and reallocation of Distribution revenue requirements to the customer charge and block 1 volumetric rate provides the revenue neutral rate design for existing load upon which Rate 1 is designed. The higher customer charge does not reflect a discount to the rate associated with incremental load but rather recovers the share of revenue requirement for load of the class prior to any incremental load. It is set at the marginal customer cost, and in doing so effectively reduces the volumetric rate for the usage associated with only the revenue neutral design. The resulting volumetric rate provides a basis by which to evaluate the design of rates for incremental heat pump load, as shown in the page 2 of the exhibit.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Did the Company consider other rate structures to incentivize heat pump adoption, such as a seasonal TOU rate? If so, provide the alternatives considered and explain why each alternative was ruled out. If not, why not?

**Response:**

Yes. The Company's considerations included a modified version of our current residential TOU rate structure incorporating 2-block and 3-block structures and potentially seasonal adjustments, a straight 3-tier block rate structure and a straight discounted rate structure. The Company also considered which of the various components of rates might be candidates for these alternatives. All alternatives were considered applied as a "whole house" rate, whereby the heat pump load is not a separately metered service or subject to its own separate treatment as a potential rate class.

There is no explicit regulatory directive to offer these or other structures, and application of a straight discount rate as has been applied in other jurisdictions raised the prospect of pure discounts with no explicit basis in utility cost of providing service as initial considerations. The Company currently offers a residential TOU rate that it believes provides presents time varying price signals that customers can easily understand and may wish to utilize for adding and operating a new heat pump, and to extend further for other uses in their home, should they choose to manage usage on a TOU (time of day) basis. With an already substantial, annualized time of day price differential, incorporate a seasonal structure adds significant complexity, especially where such seasonality would need to be evaluated extensively and have the greatest potential impact on supply, transmission and public benefits components of rates.

The concept of a block rate structure is not new, but rather is informed by previous experience with block rates for new load associated with water heaters and other end use devices. The Company has developed a variation of this approach tailored to support service to incremental heat pump load during winter months. A 3-block structure alone is difficult to apply given variability and inability to measure or standardized heat pump load blocks, and simply not possible to implement. Incorporating a block rate into the current TOU rate structure is very complex and rejected based on the expectation of causing significant customer confusion. Moreover, such a structure is not feasible and impractical to implement. However, the Company believes the current TOU rate remains an option that customers may be interested in when considering heat pump adoption.

A primary goal in offering Rate 6 is to provide an understandable and implementable solution that provides immediate benefits to customers adopting heat pump technologies, including providing a rate offering that supports affordability of electric service. The seasonal, 2-block rate structure fits within the framework of existing rate structures (i.e., Rate 1) and targets incremental heating load of new heat pumps for non-electric space heating customers. While there is no way to know and specifically measure what portions of prospective, incremental load are from heat pumps, narrowing the rate design to a 2nd tier during winter periods helps further focus special rates on incremental heat pump load. A straight discount on all kWh rates for many components of service can significantly shift costs to other customers. While proposed Rate 6 provides a lower rate for only the Distribution component of service, it does not simply discount and shift cost recovery to other customers or for an overly broad period for other components of service, and being cost based, closely targets its intended application, incremental heating season load. With Rate 7 TOU rate as one option, the structure presented under proposed Rate 6 provides a simple and beneficial alternative for customers that can be implemented at the conclusion of this case, using current metering and billing capabilities, systems and processes.

Date Filed: September 15, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Please provide the Company's summer and winter peak load by customer class under a normal weather scenario, including historical hourly system load data for the past three years. Please also provide:

a. Average hourly load by month and season for the residential class
b. Coincident peak contribution by customer class for summer and winter peaks.

**Response:**

Please refer to OCC-479, Attachment 1, for the Company's peak load by rate class and coincident peak contribution by rate class for 2023-2025.

Please refer to OCC-479, Attachment 2, for the historical hourly load for each rate class for 2023-2025.

Please refer to OCC-479, Attachment 3, for the average hourly load for the residential rate class for the 2023-2025.

Note that the data provided is not weather normalized and is provided by rate class. Data has been derived from load research analyses, which rely on extrapolations of sample data for many of the rate classes provided in the attachments, including Residential Rates 1 and 5, and small general service Rates 30 and 35).

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 – Residential Space Heating Rate) Refer to Exhibit CLP-RATES-1, at 34, which states that Rate 6 can help achieve better system utilization during winter months. Please provide whether and how the 4.7 cent and 2.8 cent discount amounts bear any relationship to seasonal marginal cost differentials derived in the marginal cost of service

**Response:**

Please note, the referenced rate is based on the build-up of annualized, class average costs, rather than a straight discount of another rate. Regarding seasonal cost characteristics, the rate of 4.7 cents/kWh is an annual average rate, and the in calculating the 4.7 cents/kWh rate and developing the winter 2nd block rate, a portion of fixed costs otherwise included in the volumetric rate have been moved to the customer charge or the 1st block rate. Since an average rate is used in all components of the Rate 6 design, the seasonal characteristic of the marginal cost rate is implicitly part of the annual average marginal cost rate utilized.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 7 – Residential TOU Rate) Please describe how the on-peak and off-peak periods under Rate 7 were selected and provide the data and workpapers used to inform the selection of these periods, such as historical or forecast hourly system load data, class load shapes, hourly or seasonal marginal costs, or other relevant information. Please provide this data in machine-readable, native format.

**Response:**

The on-peak period for Rate 7 is Weekdays 12 PM to 8 PM. Eastern Prevailing Time, during the off-peak period, is all other hours. These periods were established by PURA in the Final Decision dated December 21, 2006, in Docket No. 05-10-03 Application of The Connecticut Light and Power Company to Implement Time Of Use, Interruptible or Load Response, and Seasonal Rates.[1]

[1] https://www.dpuc.state.ct.us/dockhistpre1900.nsf/8e6fc37a54110e3e852576190052b64d/cdae8b071175a89e852582c70066c4e5?OpenDocument

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 7 – Residential TOU Rate) Please explain whether the Company has the capability to implement TOU distribution and supply rates. If so, why does Rate 7 only include TOU transmission rates but not TOU distribution or supply rates? If not, why not?

**Response:**

Currently, Rate 7 has TOU rates (defined and specifically referred to as Time-of-Day or TOD rates in the Company's tariff) for the Transmission, NBFMCC and Supply components of service. The Company has the capability to implement TOU Distribution rates (presuming using the same structure and metering and billing processes as current TOD Supply rates) recognizing developing and implementing such rates would require a regulatory directive, establishment of requirements and IT and billing system and process development, testing and implementation.

In Docket No. 03-07-02RE10, Order 3, PURA required CL&P to implement TOU pricing for the Transmission and NBFMCC bill components on January 1, 2009. In a Letter Ruling, dated November 13, 2008, the PURA stated, "CL&P will not be required to implement residential TOD Transmission or NBFMCC rates at this time".[1] PURA also stated it wanted to review the results of the meter and rate design study being conducted by CL&P.

In Docket No. 16-07-21, the Company proposed that it would ask PURA to review the Company's Rate 7 TOU pricing in its upcoming rate case. The Company proposed in Docket No. 17-10-46 that time differentiating rates be established for Transmission and NBFMCC rates only to be consistent with other TOU rates offered by the Company. This was approved in the Final Decision of Docket No. 17-10-46 dated April 18, 2018.[2]

[1] https://www.dpuc.state.ct.us/dockhistpre1900.nsf/8e6fc37a54110e3e852576190052b64d/f0e2c5cc5e1453e2852582c7004d5cda?OpenDocument
[2] https://www.dpuc.state.ct.us/2nddockcurr.nsf/8e6fc37a54110e3e852576190052b64d/94bb6bafd75d916f85258752007985f2?OpenDocument

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 7 – Residential TOU Rate) Please explain how the TOU prices were derived, including the methodology and rationale for the on-peak to off-peak ratio under Rate 7. Please provide all supporting workpapers in live Excel format with all formulas intact.

**Response:**

The current methodology for deriving the TOU pricing from Rate 7 was approved in Docket No. 17-10-46. For both Transmission and NBFMCC, the off-peak charge is set at 50 percent of the average rate. The on-peak charge is then set at the level necessary to produce the average rate class rate when combined with the off-peak rate. The on-peak and off-peak percent of sales used are from the most recent approved billing determinants for Rate Year 3 (2020).

Please refer to OCC-483, Attachment 1, for the Rate 7 TOU calculations for Transmission and NBFMCC that were most recently approved in Docket No. 26-01-03.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 7 – Residential TOU Rate) Please provide the most recent evaluation of customer usage patterns and bill savings under Rate 7.

**Response:**

Please refer to Exhibit CLP-RATES-4, at pages 7-9, for the Rate 7 Bill Frequency Report.

Refer to OCC-484, Attachment 1, for a calculation showing estimated bill savings under Rate 7, compared with billing under Rate 1, assuming 1,200 kWh usage and a 27.4% on-peak to 72.6% off-peak usage split. It is important to note that not all customers on Rate 7 would experience savings, as relative differences are dependent on the levels and time when customer's usage occurs.

Date Filed: September 08, 2026

**Witness: Jared A. Lawrence, Edward A. Davis, Shamus O'Brien and Megan Bernardini**
**Request from: Office of Consumer Counsel**

**Question:**

(TVR Customer Engagement Plan) Refer to Exh. CLP-RATES-8, at 8.

a. Which customers does the Company plan to target for outreach during the Consideration phase (e.g., high-usage customers, customers with EV charging load or other DERs)?
b. How does the Company plan to identify these customers?

**Response:**

a. During the Consideration Phase, the Company plans to target customers who are eligible for and may consider TVR or EV rate options. Outreach in this phase will become more targeted than the Awareness Phase, and may be tailored based on eligibility, customer segment or, where appropriate, the presence of electric vehicle load. This may include residential, small and medium commercial, large commercial and industrial and customers with separately metered EV charging load.

b. The Company plans to identify eligible customers for targeted outreach based on data within the customer information system, including customer class, and where applicable, EV load.

Date Filed: September 08, 2026

**Witness: Edward A. Davis and Kimberly R. Parsons**
**Request from: Office of Consumer Counsel**

**Question:**

(Rate 6 - Monthly Cost) In an unlocked Excel spreadsheet, provide monthly, quarterly and seasonal comparisons of a Heat pump ratepayer utilizing Rate 5 and proposed Rate 6 for the following scenarios:

a. 700 kWh usage
b. 1200 kWh usage
c. 700 kWh plus the usage of 1 EV
d. 700 kWh plus the usage of 2 EVs.

**Response:**

Please refer to OCC-486, Attachment 1, for the requested information.

For items (c) and (d) it was assumed that an electric vehicle (EV) using 3.5kWh/mile and 1,000 miles/month would add 350kWh/month to a customer's usage.