Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Referring to Exhibit CLP-STORM-1 at 41. The Company states that it "does not apply a specific formula" to correlate forecast damage locations to crew quantity. Please explain the method used to translate expected damage into crew requirements, including the role of professional judgment.

Response:

The Company does not use a formula to "correlate" forecast damage locations to crew quantity because this implies that the Company has access to a forecast of damage locations that is sufficiently predictive of the actual damage locations that will occur within the context of any given weather system for the Company to rely on the "correlation" outcome, which is not the case. The Company's experience and expertise is that the damage prediction models are not sufficiently accurate to cause the Company to rely conclusively on those predictions for crew sourcing. For example, an issue for the damage prediction models is that damage occurs on a localized basis, whereas Connecticut has not historically hosted weather stations in a sufficient number of locations to provide localized historical weather data that could be used by damage prediction models to potentially refine the output of the models. Methodologically, the damage prediction models do not yet have a level of reliability and accuracy to form a substantial or primary basis of crew sourcing.

As stormy conditions are approaching the Eversource distribution system, the Company's analytical exercise therefore is to gather, study and evaluate the approaching weather conditions and associated forecasts and to align those forecasts with an event level in the Event Level Matrix. At each event level, there is a correlation between the number of trouble spots and a range of resource needs for that particular weather impact. The Event Level Matrix is founded on key operational assumptions, including the number of available internal and affiliate crews typically available, typical restoration work durations and expected crew productivity during extended storm operations. As event severity increases, the response organization and resource commitments scale accordingly, including the addition of external mutual assistance and contractor resources as needed. Once the actual extent of the damage is known in terms of the nature and scope of the damage, then the Company can scale its crew resources to "correlate" with the number of known trouble spots and other necessary response actions.

The ERP Event Level Matrix serves as the foundational planning tool, while the Incident Management Team ("IMT") applies operational experience and expertise to evaluate weather

forecasts, system conditions, damage information, resource availability, regional and operational constraints. Based on this collective experience and situational awareness, the IMT refines the resource plan and determines the appropriate staging locations, crew allocations, and staffing strategy necessary to support safe and efficient restoration efforts.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Referring to Exhibit CLP-STORM-1 at 61-62, 75. The Company concludes that its decision-making was reasonable under the circumstances and that the costs were necessary. Please identify any alternative resource plans considered and explain how cost, restoration time, and risk informed the plan selected.

Response:

The Company's decision making is guided by the Emergency Response Plan ("ERP"), which is the PURA-approved framework for emergency response and restoration. The ERP is founded on a principle of scalability to align with the nature and scope of the emergency event. Based on the best information reasonably available at the time, the Company develops an event-specific resource plan using the ERP Event Level Matrix ("ELM"). The ELM adheres to the National Incident Management System ("NIMS") event level classification structure to provide the Company with the ability to scale its emergency response appropriately to the forecasted and actual damage on the electric system. The Company incurs costs to prepare for an oncoming storm system; to respond to public-safety priorities; and to restore customer outages, among other activities for the benefit of customers and local communities. Please refer to Exhibit CLP-STORM-1, at 29-30.

Public Act 12-148, An Act Enhancing Emergency Preparedness and Response, requires that ERPs address plans for restoring power to 10%, 30%, 50% and 70% of EDC customers. Within the context of the ELM, a resource plan is developed and deployed. As stated in PURA Docket No. 12-06-09 PURA Establishment Of Performance Standards For Electric And Gas Companies – Final Decision, Appendix A, "[i]n addition to submitting its ERP to the PURA for reviews of emergency plans every two years, on or before July 1st, pursuant to the General Statutes of Connecticut (Conn. Gen. Stat.) §16-32e, each EDC will also file the ERP in full when there have been any material changes in the ERP."

The ERP and ELM do not prescribe a single, fixed resource plan for each emergency event. Rather, these guidelines provide a framework for developing an event-specific resource plan based on the information available concerning the anticipated or actual scope of damage, resource availability, and other circumstances. Depending on the circumstances, the Company may use varying levels of resources and, as additional information becomes available, the Company adjusts its resource deployment plan as appropriate and necessary.

In this context, meeting public-safety needs, minimizing restoration time, and risk assessment are considered together rather than independently. As discussed in the Company's response to OCC-556[i], when procuring external resources, the Company balances cost considerations with the paramount goal of restoring service safely, efficiently and as quickly as possible. The primary decision point is the number and deployment of field crews and support personnel, and there is only one resource plan that is created for purposes of a storm event, which is captured in the Incident Action Plans ("IAP"). However, to create the IAP, numerous decisional factors are involved, and the resource plan will continually evolve through the event based on those decisional factors. In essence, any alternative plan would simply involve fewer crews at a longer restoration time or more crews. Decision points include:

- Type, scale and timing of weather event expected
- Confidence level of forecast projections
- Availability of field crews and the presence of regional need.
- Skill sets, skill levels, reliability, capabilities and proximity of field crews
- Number, type and location of forecasted and actual outage and non-outage trouble events and public safety
- Logistical circumstances
- Weather circumstances and mobility during restoration
- Status of internal considerations identified for employees and company systems and equipment
- Status of external considerations identified by external stakeholders

The Company's decisions in response to the 2024-2025 Storm Events were made within the established ERP and ELM framework and incorporated consideration of the circumstances at the time of each decision. The costs incurred were associated with the resources determined to be reasonably necessary at the time to support safe, efficient, and timely restoration of electric service to the customers, taking into account expected restoration timelines, resource availability, and cost. Across all its decision making, risks such as an unsafe, inefficient or unreasonably prolonged restoration are constantly evaluated.

[i] OCC-556 Question:

Referring to Exhibit CLP-STORM-1 at 41. The Company states that it secures the closest available resources to minimize travel time and reduce cost. Please provide comparable rates for contractors, affiliates and mutual-aid crews, and explain how proximity and cost informed resource selection.

OCC-556 Response:

When the Company procures external crews to support storm restoration, it evaluates several interrelated factors. The relative importance of each factor depends on the specific circumstances of the storm event. Generally, these factors include:

1. **Whether the storm is a regional event**. When a storm affects a broader geographic region, utilities may face increased demand and competition for available contractor resources. This can affect both the availability and cost of external crews and may require the Company to make procurement decisions within a limited timeframe.

2. **The quantity and type of resources required**. The Company determines the quantity and type of external resources needed by considering weather forecasts, anticipated damage, current system conditions, available internal resources, and other relevant information at the time of procurement. The Company's resource requirements may change as more information about the storm and its impact becomes available.

3. **The location and availability of crews**. The Company evaluates the location of available crews in relation to its service territory and their ability to mobilize within the necessary timeframe. The proximity of available crews often plays a key role, as crews closer to the service area can typically mobilize faster and charge lower mobilization and demobilization costs.

4. **The unit rate and overall cost**. The Company considers the unit rate or other applicable pricing for each available crew but does not evaluate the unit rate in isolation. Instead, it considers the anticipated total cost of securing and deploying a crew, including mobilization, demobilization, travel, and other relevant costs.

When procuring external resources, the Company balances cost considerations with the importance of restoring service safely, efficiently, and as quickly as possible. Accordingly, the crew with the lowest unit rate may not always represent the lowest total cost or the most suitable resource overall. For example, the Company may secure a crew located closer to its service territory, even if that crew has a higher unit rate than one farther away. A nearby crew may have significantly lower mobilization and demobilization costs and can often begin restoration work sooner. When these factors are considered together, the total cost for the closer crew may be less than that of a more distant crew, despite the higher unit rate. Conversely, during a regional storm event when nearby resources are in high demand or unavailable, the Company may find it necessary or more reasonable to procure crews from farther away.

While the Company frequently will prioritize the closest available resources to minimize travel time and reduce costs, it does not select contractors based on a single factor. Instead, the Company reviews all available information and the unique circumstances of each storm event to identify the resource mix that best supports safe, efficient, and timely restoration while accounting for overall cost.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

For each storm event in the proposal, please provide every resource plan prepared before or during the event, each significant revision, and the contemporaneous approval of any change to the event level or commitment of external crews. Identify the date, time, decisionmaker, resources affected, and reason for each decision. For each storm event in the proposal, please provide every resource plan prepared before or during the event, each significant revision, and the contemporaneous approval of any change to the event level or commitment of external crews. Identify the date, time, decision-maker, resources affected, and reason for each decision.

Response:

Resource plans are not static and are actively scaled during preparedness and response activities to the appropriate Emergency Response Plan ("ERP") event level based on the Event Level Matrix ("ELM"). Activities are based on the best available information at the time and are subject to adjustment due to changing conditions, forecasts, and the status and duration of customer outages. Information supporting resource mobilization, demobilization and deployment are tracked in the Incident Action Plan, which is prepared during an event with a frequency depending on the scale of the event and specific circumstances. In Exhibit CLP-STORM-IMT-3 for each storm event, the Company provided the time-stamped Incident Action Plan for each event, which includes:

- Event summary chart
- Primary weather forecasts and reports
- Incident Action Plan, including
    - Summaries of specific weather conditions
    - Detailed Restoration Status
    - Damage Prediction
    - ERP Classification & Activation
    - IMT Objectives for the Planning Period
    - Event Communications
    - Damage Assessment
    - Resource Assessment
    - Restoration Crews Working By Town

- Resource Assessment & Strategy
- Logistics & Catering
- Safety

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Referring to Exhibit CLP-STORM-1 at 28. The Company states that outage-model accuracy depends on the quality and confidence of the weather forecasts used as inputs. For each event, provide each weather and outage forecast, actual results, forecast errors, and vendor or model accuracy evaluations.

Response:

Please refer to Exhibit CLP-IMT-3 for each storm event.

The Company receives weather and outage forecasts from multiple forecasting providers and tools that produce a broad range of meteorological parameters and outage projections across the Company's entire service territory. These forecasts are highly dynamic and are routinely updated numerous times before and during an event as weather conditions evolve and additional information becomes available.

In addition, both weather forecasts and outage forecasts are probabilistic, rather than deterministic in nature. The forecasts are intended to provide a range of potential outcomes and associated confidence levels based on the best available information at a given point in time, not to predict a single, precise result. As conditions change and forecast uncertainty is reduced or increased, projected weather impacts and outage estimates may change significantly throughout the event's lifecycle.

The Company continuously evaluates forecast updates in conjunction with actual system conditions, observed damage, customer outage counts, field assessments, and restoration progress. Based on this ongoing assessment, the Company adjusts staffing levels, contractor requests, resource staging locations, restoration plans, and other operational decisions as appropriate.

A retrospective validation study comparing forecasted and actual outcomes on an event-by-event basis would be extremely difficult to perform and would provide limited practical value. Each weather event is unique with respect to storm track, wind speed and duration, precipitation type and intensity, antecedent conditions, vegetation characteristics, asset exposure, and other factors that influence system impacts. Additionally, both weather forecasts and outage projections are iterative products that may change numerous times throughout the event lifecycle. As a result, any comparison of a single forecast to actual outcomes would not adequately reflect how forecasts are used operationally or the evolving nature of event response decision-making. The UConn OPM,

for example, is continuously updated by UConn to incorporate new data and modeling enhancements intended to improve forecast performance over time.

To the extent the request seeks vendor evaluations of model performance, the Company is relying on premier weather forecasting services and sources, including weather reports prepared by the National Weather Service, the State of Connecticut Department of Emergency Management and Homeland Security and several commercial services. Understanding the track record of "accuracy" associated with these sources would provide no value to the Company as "inaccuracy" in the past says nothing about the future, as every event is different and forecasts may be "inaccurate" simply because actual forces of nature behaved differently than forecast, even by sophisticated models not because the model is inherently flawed. No weather forecast is 100% accurate, and weather forecasts do not approach 100% predictive before the actual weather event is occurring whereas the Company needs to be prepared in advance of the onset of the storm event.

Event specific assessments of model accuracy were provided in OCC-547, Attachment 1 CONFIDENTIAL through OCC-547, Attachment 6 CONFIDENTIAL, in relation to the UCONN damage prediction model.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Referring to Exhibit CLP-STORM-1 at 29-30. The Company states that event levels may be modified as conditions and actual impacts become better understood. For events with impacts below forecast, please explain how the event level and resource plan were reassessed as conditions developed.

Response:

The Company prepares for an ERP event based on weather forecasts, the potential severity and timing of the event, and other relevant information reasonably available to the Company at the time the relevant decisions are made.

As the weather system develops, actual storm impacts may differ from earlier forecasts. There are many variables that can change, including but not limited to: pressure gradient, storm track and intensity, forward speed, timing and movement of frontal boundaries, wind speeds (sustained and gusts), precipitation type and totals, radial ice accretion totals, ambient temperatures, atmospheric instability, soil moisture and ground saturation conditions, river and stream levels, storm duration, geographic extent of impacts, and the interaction of local and mesoscale weather features. Any variation in these factors can significantly affect the timing, location, severity and overall impacts of the event. No weather forecast is 100% accurate.

Therefore, the Company will err on the side of caution when impacts appear to be below forecast and maintain preparedness as weather conditions are observed. Once weather forecasts are published with new information, impacts are directly observable and the threat has passed, the Company takes steps to adjust the resource plan, including consideration of the deployment and/or demobilization of on-site resources.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Referring to Exhibit CLP-STORM-1 at 28-31. The Company identifies UCONN and DTN/SIA outage-prediction models and describes those models as reference tools.

a. Please provide each time-stamped weather, outage and damage forecast used, actual results, forecast errors together with the corresponding model inputs, outputs, confidence ranges and revisions.
b. Please show how each forecasting model performed against actual storm results, including whether it predicted too much or too little damage. Identify any changes staff made to the forecasts, who approved them, and how uncertainty affected the number of extra crews secured.
c. For each storm event, provide model accuracy evaluations.

Response:

Please refer to the Company's response to interrogatory OCC-547[i] and associated OCC-547, Attachment 1 for the requested information.

Prior Referenced Response:

[i] OCC-547 Question:
Referring to Exhibit CLP-STORM-1 at 28. The Company states that outage-model accuracy depends on the quality and confidence of the weather forecasts used as inputs. For each event, provide each weather and outage forecast, actual results, forecast errors, and vendor or model accuracy evaluations.

OCC-547 Response:

Please refer to Exhibit CLP-IMT-3 for each storm event.

The Company receives weather and outage forecasts from multiple forecasting providers and tools that produce a broad range of meteorological parameters and outage projections across the Company's entire service territory. These forecasts are highly dynamic and are routinely updated numerous times before and during an event as weather conditions evolve and additional information becomes available.

In addition, both weather forecasts and outage forecasts are probabilistic, rather than deterministic in nature. The forecasts are intended to provide a range of potential outcomes and associated confidence levels based on the best

available information at a given point in time, not to predict a single, precise result. As conditions change and forecast uncertainty is reduced or increased, projected weather impacts and outage estimates may change significantly throughout the event's lifecycle.

The Company continuously evaluates forecast updates in conjunction with actual system conditions, observed damage, customer outage counts, field assessments, and restoration progress. Based on this ongoing assessment, the Company adjusts staffing levels, contractor requests, resource staging locations, restoration plans, and other operational decisions as appropriate.

A retrospective validation study comparing forecasted and actual outcomes on an event-by-event basis would be extremely difficult to perform and would provide limited practical value. Each weather event is unique with respect to storm track, wind speed and duration, precipitation type and intensity, antecedent conditions, vegetation characteristics, asset exposure, and other factors that influence system impacts. Additionally, both weather forecasts and outage projections are iterative products that may change numerous times throughout the event lifecycle. As a result, any comparison of a single forecast to actual outcomes would not adequately reflect how forecasts are used operationally or the evolving nature of event response decision-making. The UConn OPM, for example, is continuously updated by UConn to incorporate new data and modeling enhancements intended to improve forecast performance over time.

To the extent the request seeks vendor evaluations of model performance, the Company is relying on premier weather forecasting services and sources, including weather reports prepared by the National Weather Service, the State of Connecticut Department of Emergency Management and Homeland Security and several commercial services. Understanding the track record of “accuracy” associated with these sources would provide no value to the Company as “inaccuracy” in the past says nothing about the future, as every event is different and forecasts may be “inaccurate” simply because actual forces of nature behaved differently than forecast, even by sophisticated models not because the model is inherently flawed. No weather forecast is 100% accurate, and weather forecasts do not approach 100% predictive before the actual weather event is occurring whereas the Company needs to be prepared in advance of the onset of the storm event.

Event specific assessments of model accuracy were provided in OCC-547, Attachment 1 CONFIDENTIAL through OCC-547, Attachment 6 CONFIDENTIAL, in relation to the UCONN damage prediction model.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-STORM-1 at 12, 52. The Company states that its ERP uses feedback and performance measurement for continuous improvement and that it evaluates results after ERP execution. Please identify the metrics and targets used after each event to evaluate forecast accuracy, restoration performance, resource utilization, and cost.

Response:

The Company updates its Emergency Response Plan ("ERP") every two years or when a material change occurs, in compliance with General Statutes § 16-32e. The ERP encompasses the performance standards established in PURA Doc. No. 12-06-09, PURA Establishment of Performance Standards for Electric and Gas Companies.

Please refer to the Company's response to OCC-547[i] and OCC-548[ii] for discussion on the Company's perspective on "forecast accuracy." Restoration performance is governed by the Event Level Matrix. The ELM sets out 'Typical Damage Assessment and Typical Restoration Strategy' corresponding to the escalating Event Levels. In all of the events under review in this proceeding, the Company has restored power and managed recovery within the timelines established in the ERP for typical restoration duration for the ERP Levels declared for the 2024-2025 Storm Events (Exhibit CLP-STORM-IMT-2, at 24). The ERP establishes the timeline metrics for reasonable restoration duration.

In a storm event, the restoration timeline is a function of the number of outage and non-outage events that have to be addressed and the number of field resources available. If fewer resources are deployed for a particular number of outage and non-outage events, the duration will be longer than with more crews – and vice versa – if the same jobs are done with a greater number of crews the timeline will be quicker. However, in either scenario, it is the number, type and location of damage events that drives the cost and the cost will not vary materially as all jobs have to get done, and to get the same job done, there needs to be the appropriate crew complement whether the timeline is a longer or shorter timeline. This is the reason that the Company has focused on analyzing the cost per trouble event as a reasonable metric for comparing and learning from the costs of an event.

In this regard, the greatest opportunity for cost control occur throughout the year in non-storm conditions as the Company evaluates the type of damage happening on the system, the location of

that damage, the availability and performance of the crews brought to the system, as well logistical cost reduction opportunities.

Prior Referenced Responses:

[i] OCC-547 Question:

Referring to Exhibit CLP-STORM-1 at 28. The Company states that outage-model accuracy depends on the quality and confidence of the weather forecasts used as inputs. For each event, provide each weather and outage forecast, actual results, forecast errors, and vendor or model accuracy evaluations.

OCC-547 Response:

Please refer to Exhibit CLP-IMT-3 for each storm event.

The Company receives weather and outage forecasts from multiple forecasting providers and tools that produce a broad range of meteorological parameters and outage projections across the Company's entire service territory. These forecasts are highly dynamic and are routinely updated numerous times before and during an event as weather conditions evolve and additional information becomes available.

In addition, both weather forecasts and outage forecasts are probabilistic, rather than deterministic in nature. The forecasts are intended to provide a range of potential outcomes and associated confidence levels based on the best available information at a given point in time, not to predict a single, precise result. As conditions change and forecast uncertainty is reduced or increased, projected weather impacts and outage estimates may change significantly throughout the event's lifecycle.

The Company continuously evaluates forecast updates in conjunction with actual system conditions, observed damage, customer outage counts, field assessments, and restoration progress. Based on this ongoing assessment, the Company adjusts staffing levels, contractor requests, resource staging locations, restoration plans, and other operational decisions as appropriate.

A retrospective validation study comparing forecasted and actual outcomes on an event-by-event basis would be extremely difficult to perform and would provide limited practical value. Each weather event is unique with respect to storm track, wind speed and duration, precipitation type and intensity, antecedent conditions, vegetation characteristics, asset exposure, and other factors that influence system impacts. Additionally, both weather forecasts and outage projections are iterative products that may change numerous times throughout the event lifecycle. As a result, any comparison of a single forecast to actual outcomes would not adequately reflect how forecasts are used operationally or the evolving nature of event response decision-making. The UConn OPM, for example, is continuously updated by UConn to incorporate new data and modeling enhancements intended to improve forecast performance over time.

To the extent the request seeks vendor evaluations of model performance, the Company is relying on premier weather forecasting services and sources, including weather reports prepared by the National Weather Service, the State of Connecticut Department of Emergency Management and Homeland Security and several commercial services.

Understanding the track record of "accuracy" associated with these sources would provide no value to the Company as "inaccuracy" in the past says nothing about the future, as every event is different and forecasts may be "inaccurate" simply because actual forces of nature behaved differently than forecast, even by sophisticated models not because the model is inherently flawed. No weather forecast is 100% accurate, and weather forecasts do not approach 100% predictive before the actual weather event is occurring whereas the Company needs to be prepared in advance of the onset of the storm event.

Event specific assessments of model accuracy were provided in OCC-547, Attachment 1 CONFIDENTIAL through OCC-547, Attachment 6 CONFIDENTIAL, in relation to the UCONN damage prediction model.

[ii] OCC-548 Question:

Referring to Exhibit CLP-STORM-1 at 29-30. The Company states that event levels may be modified as conditions and actual impacts become better understood. For events with impacts below forecast, please explain how the event level and resource plan were reassessed as conditions developed.

OCC-548 Response:

The Company prepares for an ERP event based on weather forecasts, the potential severity and timing of the event, and other relevant information reasonably available to the Company at the time the relevant decisions are made.

As the weather system develops, actual storm impacts may differ from earlier forecasts. There are many variables that can change, including but not limited to: pressure gradient, storm track and intensity, forward speed, timing and movement of frontal boundaries, wind speeds (sustained and gusts), precipitation type and totals, radial ice accretion totals, ambient temperatures, atmospheric instability, soil moisture and ground saturation conditions, river and stream levels, storm duration, geographic extent of impacts, and the interaction of local and mesoscale weather features. Any variation in these factors can significantly affect the timing, location, severity and overall impacts of the event. No weather forecast is 100% accurate.

Therefore, the Company will err on the side of caution when impacts appear to be below forecast and maintain preparedness as weather conditions are observed. Once weather forecasts are published with new information, impacts are directly observable and the threat has passed, the Company takes steps to adjust the resource plan, including consideration of the deployment and/or demobilization of on-site resources.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

For each storm event, please provide the lessons-learned action tracker and show how completed actions changed later event plans or procedures and how their effectiveness was verified.

Response:

The Company conducts lessons learned exercises for larger events focused on managerial and operational processes and actively pursues opportunities for improvement following every ERP event. Items developed from a formal After Action Review are tracked in an Improvement Plan. Initiatives that the Company has identified through these efforts include but are not limited to initiatives for development of a Pole Setting Branch, cost tracking, contractor hiring processes, and invoice review processes. The effectiveness of these improvements is verified through routine training and exercises. Please refer to the Company's response to interrogatory OCC-552[i] confirming that none of the storms included in the application met the requirements for an After Action Report under the standards set forth in PURA Doc. No. 12-06-09, *PURA Establishment of Performance Standards for Electric and Gas Companies,* Final Decision, Appendix A, Section 3.7 After Action Report.

Prior Referenced Response

[i] OCC-552 Question:

For each storm event, please provide the after-action reports and each post-event comparison of forecasts, resources, restoration performance and cost, including the management review and resulting corrective actions.

OCC-552 Response:

None of the storms included in the application met the requirements for an After-Action Report under the standards set forth in PURA Docket No. 12-06-09, *PURA Establishment of Performance Standards for Electric and Gas Companies,* Final Decision, Appendix A, Section 3.7 After-Action Report.

PURA Doc. No. 12-06-09, Appendix A, Section 1 Purpose and Applicability states:

> The purpose of these standards is to ensure that the electric distribution companies (EDCs) are prepared for emergencies and disasters in order to minimize damage and inconvenience to the public which may occur as a result of electric system failures, major outages, or hazards posed by damage

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to electric distribution facilities. These standards apply to any Emergency Event, which is defined as electric service interruptions involving 10% or more of the EDC's total number of customers who are out for a period of 48 consecutive hours or more..."

Please refer to Exhibit CLP-STORM-IMT-2 for storm-by-storm breakdown of costs and outage data.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

For each storm event, please provide the after-action reports and each post-event comparison of forecasts, resources, restoration performance and cost, including the management review and resulting corrective actions.

Response:

None of the storms included in the application met the requirements for an After-Action Report under the standards set forth in PURA Docket No. 12-06-09, *PURA Establishment of Performance Standards for Electric and Gas Companies,* Final Decision, Appendix A, Section 3.7 After-Action Report.

PURA Doc. No. 12-06-09, Appendix A, Section 1 Purpose and Applicability states:

> The purpose of these standards is to ensure that the electric distribution companies (EDCs) are prepared for emergencies and disasters in order to minimize damage and inconvenience to the public which may occur as a result of electric system failures, major outages, or hazards posed by damage to electric distribution facilities. These standards apply to any Emergency Event, which is defined as electric service interruptions involving 10% or more of the EDC's total number of customers who are out for a period of 48 consecutive hours or more…"

Please refer to Exhibit CLP-STORM-IMT-2 for storm-by-storm breakdown of costs and outage data.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, Mark P. Baldwin, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

For each storm event, please provide productive, travel, staging, standby, idle and demobilization hours, including the cost of hours not associated with a work assignment.

Response:

The Company interprets the request as an effort to differentiate contractor time among the categories of "productive," "travel," "standby," "idle," and "demobilization." However, the Company respectfully disagrees with the assumption that travel, standby, or related restoration activities are "non-productive," as this does not reflect the realities of storm restoration work.

Storm restoration demands mobilization, strategic positioning, coordination, and the constant availability of contractor resources. Activities such as traveling to the Company's service territory or restoration sites, staging, waiting on standby for work assignments, and demobilizing after restoration are essential elements of the restoration process. Contractors may need to remain staged and ready to respond to shifting restoration priorities, await dispatch instructions, or information required for safe completion of assigned duties. All these activities are integral to the restoration process, essential to restoring the electric system to a safe and reliable operating condition after an emergency and are productive time.

Therefore, the Company is providing information for the contractor time categories of travel, standby, and work time (i.e., performing physical restoration work)—all of which are "productive" time in the context of storm deployment. Information responsive to this request for storm MS24A was provided in the Company's response to interrogatory EOE-030[i] , which is currently being updated for the remaining storms and will be filed as a supplement to EOE-030 upon completion.

Prior Referenced Response:

[i] EOE-030 Question:

For each storm event, please provide the after-action reports and each post-event comparison of forecasts, resources, restoration performance and cost, including the management review and resulting corrective actions.

EOE-030 Response:

The Company does not track or account for the billable hours in the manner requested in this interrogatory. In order to respond to this request, the Company must perform a manual exercise to identify each billable hour by work or standby time for each individual invoice by storm. The Company is currently working through this exercise for each storm. Please reference EOE-030, Attachment 1, for a summary of hours and costs associated with external line crew support for MS24A011. The Company will supplement the remaining spreadsheets for the remaining 13 storm events included in the request.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, Mark P. Baldwin, John G. Griffin and Leanne M. Landry
Request from: Office of Consumer Counsel

Question:

For each storm event, please provide the release and demobilization criteria and quantify cancellation charges, minimum guarantees, travel, standby, unused lodging and other non-productive costs.

Response:

The Company does not agree with the characterization of travel, standby and unused lodging, or other related restoration costs as "non-productive." Such costs are necessary and reasonable components of mobilizing, maintaining and demobilizing personnel and resources during storm restoration activities. Subject to this clarification, the Company responds as follows:

Please refer to OCC-554, Attachment 1 CONFIDENTIAL, and OCC-554, Attachment 2 CONFIDENTIAL, which illustrate processes used for each storm event for not only the mobilization process but also the release and demobilization criteria. During the 2024-2025 OH Storm Contract revision there was agreement and understanding of a minimum requirement that the Company agrees to be reasonable for a cancellation policy. If a forecast storm does not materialize and the Company cancels resources at or before they complete four hours on the system, the Company will pay each affected resource a four-hour minimum for reporting in support of anticipated restoration activities. This provision is consistent with Eversource labor agreements and local IBEW agreements.

The Company has provided information regarding the contractor's time categories of travel and standby time for storm MS24A in its response to interrogatory EOE-030[i], which is currently being updated for the remaining storms and will be filed as a supplement to EOE-030 upon completion.

Prior Referenced Response:

[i] EOE-030 Question:

For each storm event, please provide the after-action reports and each post-event comparison of forecasts, resources, restoration performance and cost, including the management review and resulting corrective actions.

EOE-030 Response:

The Company does not track or account for the billable hours in the manner requested in this interrogatory. In order to respond to this request, the Company must perform a manual exercise to identify each billable hour by work or standby time for each individual invoice by storm. The Company is currently working through this exercise for each storm. Please reference EOE-030, Attachment 1, for a summary of hours and costs associated with external line crew support for MS24A011. The Company will supplement the remaining spreadsheets for the remaining 13 storm events included in the request.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Please provide any analysis of the restoration-time benefit associated with additional external crews and any lower-crew alternative considered.

Response:

The Event Level Matrix correlates anticipated damage locations and customer outages with an ERP event level, which identifies the number of crews needed to restore power within the corresponding restoration-duration range. The Company relies on weather analysis and estimated damage locations to initially establish external crew needs. Since weather is very variable, there are times when the weather is not as severe as predicted and therefore the number of crews to trouble spots could be skewed. In other events, the weather is more severe, and the Company must obtain additional external resources, and this may be accompanied by an increased number of trouble spots completed by external crews. Thus, the Company utilizes the Event Level Matrix to calibrate the number of crews for each event.

The Company does not calculate a "restoration-time benefit" that would presumably calculate how long customer interruptions could endure – and with the expectation that the Company could reduce costs with longer outage durations by using fewer crews. This type of perspective is contrary to the expectations of customers, as well as the ethic of storm response and is not consistent with the circumstances of restoration work for two primary reasons:

First, the Company prepares for a storm event *in advance of the event*, bringing crews to the system based on the forecast weather conditions and anticipated potential damage to the system. Once the crews are mobilized to the system, the cost of mobilizing them is incurred. Any additional cost incurred is a function of the actual number, type and location of damage events, as well as needs for public-safety response. When this information is known, then crews are scaled up or down in correlation with those known quantities. When the Company makes decisions to scale up or down on deployed crews, that decision is made with the objective of restoring customers within the timeline for the event, as established in the Event Level Matrix, which defines the expected restoration timeline at each event level. Thus, the cost is a function of the actual damage incurred.

Second, in a storm event, the restoration timeline is a function of the number of outage and non-outage events that have to be addressed and the number of field resources available. If fewer resources are deployed for a particular number of outage and non-outage events, the duration will

be longer than with more crews – and vice versa – if the same jobs are done with a greater number of crews the timeline will be quicker. However, in either scenario, it is the number, type and location of damage events that drives the cost and the cost will not vary materially as all jobs have to get done, and to get the same job done, there needs to be the appropriate crew complement deployed to that trouble event whether the overall timeline is a longer or shorter timeline, i.e., the crew hours necessary to address the damage is the same whether half the crews are used for double the time, or twice the crews are used for half the time. Again, the cost is a function of the number, type and location of damage events.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Referring to Exhibit CLP-STORM-1 at 41. The Company states that it secures the closest available resources to minimize travel time and reduce costs. Please provide comparable rates for contractors, affiliates and mutual-aid crews, and explain how proximity and cost informed resource selection.

Response:

When the Company procures external crews to support storm restoration, it evaluates several interrelated factors. The relative importance of each factor depends on the specific circumstances of the storm event. Generally, these factors include:

1. **Whether the storm is a regional event**. When a storm affects a broader geographic region, utilities may face increased demand and competition for available contractor resources. This can affect both the availability and cost of external crews and may require the Company to make procurement decisions within a limited timeframe.

2. **The quantity and type of resources required**. The Company determines the quantity and type of external resources needed by considering weather forecasts, anticipated damage, current system conditions, available internal resources, and other relevant information at the time of procurement. The Company's resource requirements may change as more information about the storm and its impact becomes available.

3. **The location and availability of crews**. The Company evaluates the location of available crews in relation to its service territory and their ability to mobilize within the necessary timeframe. The proximity of available crews often plays a key role, as crews closer to the service area can typically mobilize faster and charge lower mobilization and demobilization costs.

4. **The unit rate and overall cost**. The Company considers the unit rate or other applicable pricing for each available crew but does not evaluate the unit rate in isolation. Instead, it considers the anticipated total cost of securing and deploying a crew, including mobilization, demobilization, travel, and other relevant costs.

When procuring external resources, the Company balances cost considerations with the importance of restoring service safely, efficiently, and as quickly as possible. Accordingly, the

crew with the lowest unit rate may not always represent the lowest total cost or the most suitable resource overall. For example, the Company may secure a crew located closer to its service territory, even if that crew has a higher unit rate than one farther away. A nearby crew may have significantly lower mobilization and demobilization costs and can often begin restoration work sooner. When these factors are considered together, the total cost for the closer crew may be less than that of a more distant crew, despite the higher unit rate. Conversely, during a regional storm event when nearby resources are in high demand or unavailable, the Company may find it necessary or more reasonable to procure crews from farther away.

While the Company frequently will prioritize the closest available resources to minimize travel time and reduce costs, it does not select contractors based on a single factor. Instead, the Company reviews all available information and the unique circumstances of each storm event to identify the resource mix that best supports safe, efficient, and timely restoration while accounting for overall cost.

Date Filed: September 16, 2026

Witness: Donald J. Scacco Jr., Christopher E. Colorio, and Mark P. Baldwin
Request from: Office of Consumer Counsel

Question:

Referring to Exhibit CLP-STORM-1 at 63, 74-75. The Company reports compliance with Typical Restoration Duration and describes the OMS cost comparison as a "rough comparison." Please identify the metrics used to evaluate restoration cost effectiveness and provide the data supporting the OMS cost-per-event comparison.

Response:

The question conflates three distinct concepts: (1) Typical Restoration Duration; (2) Cost per Event, which serves as a reasonable comparative data point for the Company's storm experience; and (3) cost-effectiveness, which is not a concept generally applicable to storm response.

Typical Restoration Duration is a planning benchmark in the Event Level Matrix ("ELM") for each event level, developed by analyzing historical large outages and major storms and applying worst-case scenario planning. The ELM serves as a framework for storm response planning, not for evaluating "cost-effectiveness."

The ELM intentionally includes overlapping event levels and outcome ranges to account for the inherent unpredictability of emergency events. Many variables, such as weather, time of day, season, geographic distribution of damage, crew availability, and regional impacts, can influence restoration duration. Restoration may take longer when damage is widespread and crews are limited or proceed more efficiently when damage is localized and adequate crews are available. An emergency event does not unfold according to a fixed script - it evolves in real time. The resource ranges and overlaps within the ELM reflect the complexities and uncertainties of real-world operations and support flexible, adaptive decision-making throughout emergency response efforts.

The Company has validated the ELM through its experience during storm events. During the 2024–2025 Storm Events, the Typical Restoration Durations established in the ELM proved to be an effective planning benchmark. As detailed in Exhibit CLP-STORM-IMT-2 (page 24), for every event for which an ERP was declared, restoration was completed within the Typical Restoration Duration for the corresponding ERP Level.

Cost Per Event Comparative Benchmark. The Cost Per Event data point is not a measure of cost-effectiveness. As shown in Exhibit CLP-STORM-IMT-2 and described on pages 74-75 of

Exhibit CLP-STORM-1, it is determined by dividing the total storm cost by the sum of Outage Events and Non-Outage Events. This data point is designed to establish a relative benchmark for comparison of cost between storm events.

Storm costs can vary significantly depending on how, why, where, and when conditions occur. Restoration costs and event counts are shaped by each storm's unique circumstances—such as severity, type, location, geographic spread of damage, the resources involved, the nature of restoration work, site accessibility, make-safe needs, and the response's duration and complexity.

Cost-Effectiveness. Cost-effectiveness cannot be reduced to a single objectively measurable metric because the resources required and the results achieved during storm restoration depend on the circumstances of each event. On a trouble-event basis, power must be restored regardless of the specific cost of restoring power to that location. The Company does not have a choice to decide against the restoration of power. The overall cost of a storm response is primarily a function of the aggregate cost to respond to individual trouble events. Therefore, the more appropriate benchmark is the Cost Per Event Comparative Benchmark.

In terms of crew deployment, the incremental crews specified for each ERP Level in the ELM represent the additional staffing the Company anticipates is necessary when escalating to a higher Event Level. To develop these estimates, the Company calculated the expected additional "production" from deploying more crews, based on certain assumptions: (1) each crew consists of two FTEs; (2) one crew can complete 2.5 jobs in a 16-hour day; and (3) 50 crews can address 125 trouble spots in a day. These assumptions serve as a foundational guide for estimating staffing requirements, not as a measure of cost-effectiveness. The number of jobs a crew can complete in a 16-hour day may differ from these assumptions depending on the specifics of each event. Factors such as the nature of the damage, accessibility, weather conditions, and available resources can influence whether a two-person crew completes more or fewer than 2.5 jobs per day and may also affect the number of crews deployed. Therefore, the ELM's incremental crew estimates are intended to guide storm-response planning and resource allocation, not to measure the cost-effectiveness of restoration activities.

Date Filed: September 16, 2026

Witness: Andrew C. Belden and Jared A. Lawrence
Request from: Office of Consumer Counsel

Question:

(STANDARD SERVICE)

a. May a residential customer contracted with an electric supplier return to standard service on the same day as calling the Company and requesting to return to standard service? If no, how long until the switch occurs? Please cite all applicable Authority or legal guidance, and provide all Company written policies and procedures.

b. May a business/commercial customer contracted with an electric supplier return to standard service on the same day as calling the Company and requesting to return to standard service? If no, how long until the switch occurs? Please cite all applicable Authority or legal guidance, and provide all Company written policies and procedures.

Response:

a. All residential rate customers can drop an electric supplier and return to Standard Service on the same day as calling the Company to request to return to standard service. When a customer contacts the Contact Center to request that their supplier be dropped the same day, the Customer Service Representative ("CSR") will prorate the customer's usage as of the date of the request while on the phone with the customer. Once the prorated read has been completed and the supplier has been dropped, the CSR will advise the customer that they have been returned to Standard Service. The customer will see this information reflected on their next bill.

Conn. Gen. Stat. § 16-244c(i)(6), established in 2014, states: "An electric distribution company shall transfer a residential customer to the standard service rate not later than seventy-two hours after receipt of a request from a residential customer eligible for standard service, provided such customer shall remain on the standard service rate for at least the remainder of that billing cycle." Based on Conn. Gen. Stat. § § 16-244c(i)(6), in the Final Decision PURA issued on November 5, 2014 in Docket No 13-07-18, *PURA Establishment of Rules for Electric Suppliers and Electric Distribution Companies Concerning Operations and Marketing in the Electric Retail Market*, PURA directed the EDCs to implement a process to transfer residential customers to Standard Service within 72 hours after a customer requests such a transfer.

These legal requirements serve as the Company's guiding principle on procedures for the timing of returning residential customer accounts to Standard Service.

b. Commercial customers on rates 27, 27A, 30, and 30A may also drop an electric supplier and return to Standard Service on the same day as calling the Company and requesting to return to standard service, as a courtesy to those commercial customers. All other commercial customers will be returned to standard service on the date of the customer' next scheduled meter read.

In the Final Decision issued on January 13, 1999 in Docket No. 98-06-17, *DPUC Investigation into Billing and Metering Protocols and Appropriate Cost-Sharing Allocations among Electric Distribution Companies and Electric Suppliers*, PURA set forth the following rule: "**If the Customer informs the Distribution Company directly,** generation service may be terminated within two business days for residential customers; **for other customers, generation service shall be terminated on the date of the Customer's next scheduled meter read**." (Emphasis added.) With respect to residential customers, PURA's rule in this 1999 Final Decision was superseded in 2014 by the enactment of Conn. Gen. Stat. § 16-244c(i)(6), which applies to residential customers only, and PURA's Final Decision in Docket No. 13-07-18 implementing Conn. Gen. Stat. § 16-244c(i)(6). PURA's rule in the Final Decision in Docket No. 98-06-17 remains in place for customers other than residential customers. Therefore, commercial customers are returned to standard service on the date of the customers' next scheduled meter read, and the Company is also able to return commercial customers with the qualifying rates listed above to standard service on the same day as the customer calls the Company, as a courtesy to those customers. The Company can perform this courtesy for commercial customers with qualifying rates because these commercial customer rates allow an estimated statement read which allows for a same day drop.

This legal requirement serves as the Company's guiding principle on procedures for the timing of returning commercial customer accounts to Standard Service.