Date Filed: August 24, 2026

Witness: Danielle Munson and Marianne H. Eichler
Request from: Office of Consumer Counsel

Question:

(CORPORATE STRUCTURE)

a. Please provide an organizational chart showing the Eversource organizational structure (including all operating companies, etc…).
b. Please provide an organizational chart for CL&P, showing all employee positions and their entire chains of command.

Response:

a. Please refer to EOE-065, Attachments 1 and 2, for an organizational chart showing the Eversource organizational structure of all affiliates for 2025 and 2026, respectively.

b. Please refer to OCC-192, Attachment 1 CONFIDENTIAL, for an organizational chart for CL&P.

Date Filed: August 28, 2026

Witness: Sasha Lazor
Request from: Office of Consumer Counsel

Question:

(COMPENSATION) Please refer to Exhibit CLP-EMPLOYEE-1, p. 7, where the Company states its employees are compensated "competitively in comparison to compensation paid by other employers in the energy/utility and general industry sectors."

a. Please provide all studies and/or research the Company has conducted or has caused to be conducted from 2018 to the present indicating the compensation paid by other employers in the energy/utility and general industry sectors.
b. Please provide all studies and/or research informing the Company's compensation structure for its employees.

Response:

Please refer to OCC-193, Attachments 1 through 8 CONFIDENTIAL, presenting the confidential, proprietary compensation surveys referenced in Exhibit CLP-EMPLOYEE-1, p. 7. Compensation data is retained on the Willis Towers site for the past two years.

OCC-193 Attachment	Description
1	2025 Willis Towers Watson Energy Benchmark Survey
2	2025 Willis Towers Watson General Benchmark Survey - Part 1
3	2025 Willis Towers Watson General Benchmark Survey - Part 2
4	2024 Willis Towers Watson Energy Benchmark Survey
5	2024 Willis Towers Watson General Benchmark Survey - Part 1
6	2024 Willis Towers Watson General Benchmark Survey - Part 2
7	2025 Willis Towers Watson Salary Budget Planning Survey
8	2024 Willis Towers Watson HR Policies and Practices Report

Date Filed: August 21, 2026

Witness: Sasha Lazor and Christopher L. Hall
Request from: Office of Consumer Counsel

Question:

(UNION AGREEMENT) Please refer to Exhibit CLP-EMPLOYEE-1 p. 15-18. Please provide copies of all union agreements in effect between January 1, 2018, through the present, including all addendums and/or exhibits indicating compensation rates.

Response:

Please refer to the response to EOE-041[i] and EOE-041, Attachment 1, for the requested documents.

Prior Referenced Response:

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[i] EOE-041 Question:
(UNION AGREEMENTS) Provide both a listing of and copies of all union agreements in effect between 2018 and present.

EOE-041 Response:
Please refer to EOE-041, Attachment 1, which contains copies of the following union agreements in effect between 2018 and present:

CONVEX Contract September 1, 2017 – September 1, 2021
CONVEX Contract September 1, 2021 – September 1, 2024
CONVEX Contract September 1, 2024 – September 1, 2028

Customer Service Center Contract July 15, 2021 – April 1, 2024
Customer Service Center Contract April 1, 2024 – April 1, 2028

DSO Contract October 1, 2017 – October 1, 2021
DSO Contract October 1, 2021 – October 1, 2024
DSO Contract October 1, 2024 – October 1, 2028

Eversource Gas Steelworkers Clerical/Technical Contract May 15, 2018 – May 15, 2024
Eversource Gas Steelworkers Clerical/Technical Contract May 15, 2024 – May 15, 2029

Eversource Gas Steelworkers Physical/Operating Contract May 15, 2018 – May 15, 2024
Eversource Gas Steelworkers Physical/Operating Contract May 15, 2024 – May 15, 2028

NSTAR Local 369 Local 369 Contract June 2, 2015 – June 1, 2018
NSTAR Local 369 Contract Extension Memorandum of Agreement June 2, 2018 – June 1, 2021

NSTAR Local 369 Contract Memorandum of Agreement June 2, 2021 – June 1, 2025
NSTAR Local 369 Contract Memorandum of Agreement June 2, 2025 – June 1, 2029

NSTAR Local 12004 Contract April 1, 2017 – March 31, 2020
NSTAR Local 12004 Contract April 1, 2020 – March 31, 2024
NSTAR Local 12004 Contract April 1, 2024 – March 31, 2028

Teal Book Contract June 1, 2016 – June 1, 2019
Teal Book Contract June 1, 2019 – June 1, 2022
Teal Book Contract June 1, 2022 – June 1, 2026
Teal Book Contract Final Summary June 1, 2026 – June 1, 2030

WMECO Gray Book Contract October 1, 2016 – October 1, 2020
NSTAR Gray Book Contract October 1, 2020 – October 1, 2023
NSTAR Gray Book Contract October 1, 2023 – October 1, 2027

Yankee Gas White Book Contract December 1, 2018 – December 1, 2022
Yankee Gas White Book Contract December 1, 2022 – December 1, 2026

Date Filed: August 28, 2026

Witness: Sasha Lazor
Request from: Office of Consumer Counsel

Question:

(COMPENSATION) Please refer to Exhibit CLP-EMPLOYEE-1. Please provide the source material used to create Tables 3 through 7.

Response:

Please refer to the Company's response to OCC-193[i] for the source material used to created Tables 3 through 7.

Prior Referenced Response:

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[i] OCC-193 Question:

(COMPENSATION) Please refer to Exhibit CLP-EMPLOYEE-1, p. 7, where the Company states its employees are compensated "competitively in comparison to compensation paid by other employers in the energy/utility and general industry sectors."

a. Please provide all studies and/or research the Company has conducted or has caused to be conducted from 2018 to the present indicating the compensation paid by other employers in the energy/utility and general industry sectors.
b. Please provide all studies and/or research informing the Company's compensation structure for its employees.

OCC-193 Response:

Please refer to OCC-193, Attachments 1 through 8 CONFIDENTIAL, presenting the confidential, proprietary compensation surveys referenced in Exhibit CLP-EMPLOYEE-1, p. 7. Compensation data is retained on the Willis Towers site for the past two years.

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8	2024 Willis Towers Watson HR Policies and Practices Report

Date Filed: August 21, 2026

Witness: Sasha P. Lazor and Marianne H. Eichler
Request from: Office of Consumer Counsel

Question:

(VARIABLE PAY) Please refer to Exhibit CLP-EMPLOYEE-1, p. 32, Table 8. Please explain in detail each of the metrics, including the components of the "Enhance the Customer Experience" and "Clean Energy Execution" metrics, and how each was met to earn variable pay.

Response:

Please refer to the response to CIEC-015[i]. There are two stages to the Company's variable pay program. In the first stage, there is an annual determination ***to fund variable pay compensation and at what level***. This is a determination made by the Board of Trustees, which views the determination on a holistic, enterprise-wide basis because – when the decision is made to fund the variable pay compensation component – it is a decision that will apply across the entire Eversource Energy enterprise for all employees of every division and operating unit. This determination is made by the Board of Trustees based on a pre-determined mix of financial and service-based objectives. This stage is described in detail in CIEC-015 Attachment 1 (2026 Proxy Statement), at pages 48-52, reflecting a weighting of approximately 70% financial objectives and 30% service-related objectives.

The second stage of the Eversource Energy variable pay program is the determination of ***what individual employees have earned in the prior performance year*** in relation to their specific performance goals.

Table 8 in Exhibit CLP-EMPLOYEE-1 correlates to the first stage of the annual variable pay procedure. Specifically, Exhibit CLP-EMPLOYEE-1, at 31, at lines 15-18, explains that Table 8 "provides the target goals set by Eversource in 2024 and 2025 applicable to the decision as to whether the variable pay pool should be funded. These goals are solely for the purpose of determining whether the variable pay pool should be funded."

Thus, the referenced metrics of "Enhance the Customer Experience" and "Clean Energy Execution" are metrics evaluated at the enterprise-wide level, not metrics that generally determine what individual employees "earn" for a given performance year.

With respect to the metric "Enhance the Customer Experience," the proxy statement discusses the five separate initiatives that comprise the goal. See, CIEC-015, Attachment 1 (2026 Proxy Statement), at page 51-52, excerpted in relevant part, below:

• ENHANCE THE CUSTOMER EXPERIENCE:

Goal	Outcome
Efficiently execute the Massachusetts Advanced Metering Infrastructure project.	• We made significant progress on our Massachusetts AMI throughout 2025. The Company completed construction of the enhanced AMI field network required to utilize all of the meter data in western Massachusetts and the eastern Massachusetts scope is advancing as planned. Meter installations began in western Massachusetts in July of 2025, with the completion of meter installations expected across the state for all 1.4 million customers at the end of 2027. • Our OMNI project implemented an industry leading SAP Customer Relations and Billing and Cloud for Customer software for some of our Massachusetts gas customers. Phase II is in progress for our electric and remaining gas customers in Massachusetts. • We constructed and launched the Grid Edge Modernization lab to enable the Company to provide community stakeholders, the media and our employees with a firsthand look at the technology the Company has in place for our customers.
Enhance strategies to improve the execution of the Emergency, Storm and Business Continuity Response and Stakeholder Communication Plans.	• At Eversource, customer and operational security is of critical importance, and we have completed the following enhancements to safeguard this data: ◦ Commenced the transition to a third-party co-location for data centers to reduce operational risk and support future growth; ◦ Hardened physical access to our existing Connecticut data centers to enhance protection of confidential information.
Educate customers regarding energy costs and impacts of decarbonization.	• We developed ratepayer affordability campaigns to promote education of customer bills and the impact of usage to our electric and gas customers. A new customer bill design, based on surveys of gas customers, was rolled out in Massachusetts in November 2025. We also focused on budget billing and energy efficiency options for our customers.

2026 Proxy Statement 51

CONTENTS

COMPENSATION DISCUSSION AND ANALYSIS

Goal	Outcome
Advance the Company's commitment to equity with customers, communities and key stakeholders.	• We engaged community partners with support and information on our business and programs, and the Company purchased approximately $47 million in historic and affordable housing tax credits which support important projects in key communities across Connecticut. The Company received the United Way Pioneer Valley Champions Award for its development of an Environmental Justice mapping tool.
Execute the approximately $900 million Energy Efficiency Plan budget for Connecticut, Massachusetts and New Hampshire.	• To support increased energy efficiency goals in Connecticut, Massachusetts and New Hampshire, we executed the $900 million Energy Efficiency Plan with increased focus on equity and customer centric electrification. We implemented other initiatives including electric vehicle charging, innovation pilots, battery storage, and federal projects.

• The Committee determined this goal to have attained a 165 percent performance result.

The extent to which this 2025 goal was achieved, and this goal's "weighting" in CIEC-015, Attachment 1 (2026 Proxy Statement), at page 48, excerpted in relevant part, below:

Enhance the Customer Experience	Advanced Metering Infrastructure rollout, Energy Efficiency programs, stakeholder and community engagement and data security programs	165%	8.33%

With respect to the metric "Clean Energy Execution," the proxy statement discusses the extent to which the 2025 goal was achieved and the goal's "weighting." See, CIEC-015, Attachment 1 (2026 Proxy Statement), at page 40, excerpted in relevant part, below:

- **Clean Energy Execution:** We successfully advanced our initiatives in supporting clean-energy projects:
  - Successfully completed the final year of the 2022-2025 Massachusetts Department of Public Utilities authorized grid modernization plan, including the deployment of over 3,000 monitoring and control devices in Massachusetts substations and distribution lines. Placed into service over $68 million of capital for Grid Modernization.
  - In 2025, Eversource broke ground on the $1.8 billion Greater Cambridge Energy Program, an innovative package of transmission and distribution upgrades to meet expected increases in electric demand, support key industries driving Massachusetts' economy, and enable electrification and decarbonization.
  - Reported strong performance on our Networked Geothermal Pilot in Framingham, Massachusetts through the winter and summer seasons, and received a commitment for U.S. Department of Energy (DOE) funding to support an Expansion Loop with the potential for an additional 180 customers of all types.

The extent to which this 2025 goal was achieved, and this goal's "weighting" in the Annual Program appears in the table on page 48:

Clean Energy Execution	Non-pipe alternatives, execution of Massachusetts Grid Modernization, geothermal and decarbonization projects	160%	8.33%

The detailed discussion of this goal, and the five separate initiatives that comprise the goal, appears on page 52:

• **CLEAN ENERGY EXECUTION:**

Goal	Outcome
Integrate gas and electric systems planning to promote the ability to assess reliable non-pipe alternatives (NPA) enabling electrification.	• During 2025, Eversource implemented a formal structure and framework to assess the viability of NPA to electrify customer heating needs without compromising reliability of the underlying gas infrastructure and increasing ratepayer burden. The NPA framework, a model tariff and cost recovery proposal were filed with the Climate Compliance Plan.
Execute the recently approved Massachusetts Electric Sector Modernization Plan to enable a clean energy future in support of state policies.	• Eversource successfully completed the final year of the 2022-2025 Massachusetts Department of Public Utilities authorized grid modernization plan. We deployed over 3,000 monitoring and control devices in Massachusetts substations and distribution lines which increased the visibility and control of the grid to improve reliability and integrate distributed energy resources to meet or exceed regulatory commitment.
Plan, develop and build transmission infrastructure to facilitate the interconnection of clean, renewable energy projects.	• In 2025, Eversource broke ground on the $1.8 billion Greater Cambridge Energy Program, an innovative package of transmission and distribution upgrades to meet expected increases in electric demand, support key industries driving Massachusetts' economy, and enable electrification and decarbonization. The project, which includes a first-of-its-kind underground substation, required ongoing close partnership with the Cambridge Redevelopment Authority, the real estate owner, and other public and private partners to achieve siting approval.
Expand the development of utility-owned solar and geothermal technology.	• In 2025, the Company advanced its Control Room of the Future initiative by deploying the first distribution management system (DMS) into service in Massachusetts. The DMS will provide control room operators visibility reflecting the impact of solar generation, electric vehicles and other factors impacting power flow across the grid and enable self-healing automation to dynamically restore customers by re-routing power flows within one minute of the start of an outage. • Our geothermal pilot demonstrated strong geothermal system performance through the winter and summer seasons. We received a grant for the expansion loop in Framingham, Massachusetts on the geothermal project from the DOE.
Execute Distributed Energy Resource (DER) initiatives in Massachusetts.	• We advanced our DER Initiatives in line with the Massachusetts DPU four-year mandate by continuing project planning for future construction of approved major clean energy interconnection hubs to enable renewable energy projects.
• The Committee determined this goal to have attained a 160 percent performance result.	

Prior Referenced Response:

[i] CIEC-015 Question:

(Employee Compensation and Benefits Panel) Does the Company's variable pay program include any employee incentive tied to capital additions? If the answer is in the affirmative, identify and explain in detail each such incentive.

CIEC-015 Response:

There are two stages to the Company's variable pay program. In the first stage, there is an annual determination ***to fund variable pay compensation and at what level***. This is a determination made by the Board of Trustees, which views the determination on a holistic, enterprise-wide basis because – when the decision is made to fund the variable pay compensation component – it is a decision that will apply across the entire Eversource Energy enterprise for all

employees of every division and operating unit. From a corporate financial perspective, this is a determination in the range of $80 million on an enterprise-wide basis, which is therefore made by the Board of Trustees based on a pre-determined mix of financial and service-based objectives. This stage is described in detail in CIEC-015, Attachment 1 (2026 Proxy Statement), at pages 48-52, reflecting a weighting of approximately 70% financial objectives and 30% service-related objectives. At this level, there is no metric tied to capital additions or achievement of the capital expenditure forecast.

The second stage of the Eversource Energy variable pay program is the determination of ***what individual employees have earned in the prior performance year*** in relation to their specific performance goals. The determination of what each individual employee has earned is derived through an annual "top-to-bottom" process within each operating unit whereby the performance of each employee is evaluated and rated as compared to a designated slate of goals that are tailored to the employee's specific work function and role within the organization. Within an operating affiliate, such as CL&P, the employee-specific performance goals are 100% tied to customer-beneficial functions and activities.

Depending on the function and role of the employee, the employee's specific performance goals may include "financial" objectives such as budget control and efficiency innovation. These types of financial objectives benefit customers directly by helping to control costs and assure efficiency in the cost of providing service to customers in day-to-day operations. In this regard, there is no employee that is incentivized to find capital additions for the purpose of achieving earnings or growing rate base. However, employees may have a performance goal that seeks to incentivize good budget practices, such as budget accuracy or bringing the work plan in on budget. Good performance on these types of goals works to the direct benefit of customers by assuring rational and efficient business operations.

Date Filed: August 21, 2026

Witness: Sasha P. Lazor and Marianne H. Eichler
Request from: Office of Consumer Counsel

Question:

(VARIABLE PAY) Please refer to Exhibit CLP-EMPLOYEE-1, p. 32, Table 8. One of the metrics includes "execution of Massachusetts Grid Modernization." Please explain how this assisted Connecticut customers.

Response:

As discussed in response to OCC-196[i], Table 8 in Exhibit CLP-EMPLOYEE-1 correlates to the first stage of the annual variable pay procedure. Specifically, Exhibit CLP-EMPLOYEE-1, at 31, at lines 15-18, explains that Table 8 "provides the target goals set by Eversource in 2024 and 2025 applicable to the decision as to whether the variable pay pool should be funded. These goals are solely for the purpose of determining whether the variable pay pool should be funded."

As a multi-state, multi-line of business organization, the corporate and customer-based metrics applicable to the enterprise-wide *funding determination* appropriately include "execution of the Massachusetts Grid Modernization" because execution of the Massachusetts Grid Modernization program is important to the overall goals of the Eversource Energy enterprise.

At the second stage where *individual performance* and the associated *earned variable pay* is determined, individual performance is assessed only on the aspects of the business in which employees are specifically involved. For example, the performance of a Connecticut field employee would *not* be based on the "execution of Massachusetts Grid Modernization." However, an employee that provides regulatory support across all three jurisdictions may have an individual performance goal pertaining to the "execution of Massachusetts Grid Modernization," although this portion of the employee's variable pay would be charged to the Massachusetts electric company, not CL&P. Work performed by employees on a shared basis among operating companies is appropriately allocated among those entities for financial reporting and rate recovery purposes.

Prior Referenced Response:

[i] OCC-196 Question:

(VARIABLE PAY) Please refer to Exhibit CLP-EMPLOYEE-1, p. 32, Table 8. Please explain in detail each of the metrics, including the components of the "Enhance the Customer Experience" and "Clean Energy Execution"

metrics, and how each was met to earn variable pay.

OCC-196 Response:

Please refer to the response to CIEC-015[i]. There are two stages to the Company's variable pay program. In the first stage, there is an annual determination ***to fund variable pay compensation and at what level***. This is a determination made by the Board of Trustees, which views the determination on a holistic, enterprise-wide basis because – when the decision is made to fund the variable pay compensation component – it is a decision that will apply across the entire Eversource Energy enterprise for all employees of every division and operating unit. This determination is made by the Board of Trustees based on a pre-determined mix of financial and service-based objectives. This stage is described in detail in CIEC-015, Attachment 1 (2026 Proxy Statement), at pages 48-52, reflecting a weighting of approximately 70% financial objectives and 30% service-related objectives.

The second stage of the Eversource Energy variable pay program is the determination of ***what individual employees have earned in the prior performance year*** in relation to their specific performance goals.

Table 8 in Exhibit CLP-EMPLOYEE-1 correlates to the first stage of the annual variable pay procedure. Specifically, Exhibit CLP-EMPLOYEE-1, at 31, at lines 15-18, explains that Table 8 "provides the target goals set by Eversource in 2024 and 2025 applicable to the decision as to whether the variable pay pool should be funded. These goals are solely for the purpose of determining whether the variable pay pool should be funded."

Thus, the referenced metrics of "Enhance the Customer Experience" and "Clean Energy Execution" are metrics evaluated at the enterprise-wide level, not metrics that generally determine what individual employees "earn" for a given performance year.
With respect to the metric "Enhance the Customer Experience," the proxy statement discusses the five separate initiatives that comprise the goal. See, CIEC-015, Attachment 1 (2026 Proxy Statement), at page 51-52, excerpted in relevant part, below:

• ENHANCE THE CUSTOMER EXPERIENCE:

Goal	Outcome
Efficiently execute the Massachusetts Advanced Metering Infrastructure project.	• We made significant progress on our Massachusetts AMI throughout 2025. The Company completed construction of the enhanced AMI field network required to utilize all of the meter data in western Massachusetts and the eastern Massachusetts scope is advancing as planned. Meter installations began in western Massachusetts in July of 2025, with the completion of meter installations expected across the state for all 1.4 million customers at the end of 2027. • Our OMNI project implemented an industry leading SAP Customer Relations and Billing and Cloud for Customer software for some of our Massachusetts gas customers. Phase II is in progress for our electric and remaining gas customers in Massachusetts. • We constructed and launched the Grid Edge Modernization lab to enable the Company to provide community stakeholders, the media and our employees with a firsthand look at the technology the Company has in place for our customers.
Enhance strategies to improve the execution of the Emergency, Storm and Business Continuity Response and Stakeholder Communication Plans.	• At Eversource, customer and operational security is of critical importance, and we have completed the following enhancements to safeguard this data: ◦ Commenced the transition to a third-party co-location for data centers to reduce operational risk and support future growth; ◦ Hardened physical access to our existing Connecticut data centers to enhance protection of confidential information.
Educate customers regarding energy costs and impacts of decarbonization.	• We developed ratepayer affordability campaigns to promote education of customer bills and the impact of usage to our electric and gas customers. A new customer bill design, based on surveys of gas customers, was rolled out in Massachusetts in November 2025. We also focused on budget billing and energy efficiency options for our customers.

COMPENSATION DISCUSSION AND ANALYSIS

Goal	Outcome
Advance the Company's commitment to equity with customers, communities and key stakeholders.	• We engaged community partners with support and information on our business and programs, and the Company purchased approximately $47 million in historic and affordable housing tax credits which support important projects in key communities across Connecticut. The Company received the United Way Pioneer Valley Champions Award for its development of an Environmental Justice mapping tool.
Execute the approximately $900 million Energy Efficiency Plan budget for Connecticut, Massachusetts and New Hampshire.	• To support increased energy efficiency goals in Connecticut, Massachusetts and New Hampshire, we executed the $900 million Energy Efficiency Plan with increased focus on equity and customer centric electrification. We implemented other initiatives including electric vehicle charging, innovation pilots, battery storage, and federal projects.
• The Committee determined this goal to have attained a 165 percent performance result.	

The extent to which this 2025 goal was achieved, and this goal's "weighting" in CIEC-015, Attachment 1 (2026 Proxy Statement), at page 48, excerpted in relevant part, below:

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  - Reported strong performance on our Networked Geothermal Pilot in Framingham, Massachusetts through the winter and summer seasons, and received a commitment for U.S. Department of Energy (DOE) funding to support an Expansion Loop with the potential for an additional 180 customers of all types.

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Execute Distributed Energy Resource (DER) initiatives in Massachusetts.	• We advanced our DER Initiatives in line with the Massachusetts DPU four-year mandate by continuing project planning for future construction of approved major clean energy interconnection hubs to enable renewable energy projects.

• The Committee determined this goal to have attained a 160 percent performance result.

Date Filed: August 28, 2026

Witness: Sasha P. Lazor and Marianne H. Eichler
Request from: Office of Consumer Counsel

Question:

(VARIABLE PAY) Please refer to Exhibit CLP-EMPLOYEE-1, Table 8.

a. Please provide the data in Table 8 for each year from 2018 through 2023, including a separate table for each year.

Response:

Please refer to OCC-198, Attachment 1, for data from 2018 to 2023.

Date Filed: August 21, 2026

Witness: Danielle Munson
Request from: Office of Consumer Counsel

Question:

(COMPENSATION) Please refer to Exhibit CLP-EMPLOYEE-1. Please indicate from 2018 to the present how employee compensation (base pay, variable pay, and benefits) has been divided among the Company's operating companies for employees performing tasks for multiple companies, specifically indicating how Eversource ensures that employees performing work for multiple companies have their compensation allocated appropriately.

Response:

All employees are required to abide by and follow the corporate "Time Reporting Policy," which informs how base pay is divided among the Eversource Energy operating companies. As noted in the policy, "Each subsidiary or business segment should be charged directly, when possible, for employees' time benefiting that subsidiary or business segment." This avoids cross-subsidization between the Operating Companies, including CL&P. Please refer to OCC-199, Attachment 1, for this policy.

The following sections labeled "Shared Services and Cost Accounting" and "Shared Service Controls and Reporting" describe how productive labor (i.e. base pay) is assigned to the subsidiary/business segment and the controls in place to ensure employees performing work for multiple companies have their compensation allocated appropriately.

Shared Services and Cost Accounting

A Service Company Operating Agreement is in place between the Eversource Energy Service Company ("ESC") and CL&P to govern the provision of services provided by the ESC. Please refer to OCC-199, Attachment 2, for the service agreement between ESC and the Company for a description of the services that are provided.

There is intelligence built into accounting work orders that inform the assignment of costs to the operating companies, including CL&P, when time is entered into the Workforce system, which is the Human Resources and Information System ("HRIS") used for reporting time charging. When an ESC employee is providing services to one subsidiary or business segment, the direct methodology is utilized. These are categorized as the "N" rate codes, which will directly assign 100% of the costs to that subsidiary or business segment. For example, the following ESC work order has been established for employees supporting the CL&P distribution rate case proceeding:
CL&P: CT260N11

The last three characters of the work order number contain an alpha followed by two digits. The alpha character in these examples is an "N," which indicates the methodology. In this case, "N" indicates use of the direct-charging methodology, whereby 100% of the charges will be directly assigned to a subsidiary or business segment. The last two digits of a work order number utilizing the direct methodology indicate the entity code, which is the subsidiary or business segment. When ESC employees charge the work orders noted above, the charges are assigned 100% to CL&P (entity 11). Please refer to EOE-065, Attachment 1, for a listing of the Eversource entities.

When costs are incurred to serve the Operating Companies more broadly and cannot be directly assigned by charging an operating company work order or utilizing the ESC direct methodology, costs are allocated based on a specific causal-based methodology. For example, the Plant Accounting team provides accounting services to the Operating Companies and generally allocates their time based on the Gross Plant Assets methodology; whereas members of the Customer Care team generally allocate their time based on the Number of Customers or Customer Handle Time methodologies. Allocations are made only after it is determined that it is not practical or reasonably possible to perform a direct assignment of the costs.

When direct charging is not feasible and a specific causal-based methodology cannot be utilized, common allocators are used to allocate costs. The common methodology is based on the average of net income and gross plant assets. For example, the Corporate Accounting team primarily charges work order ACTG0C04 when supporting the monthly financial close of Eversource Energy. The employees in this organization generally use a common allocator as there is no specific causal driver of the costs or causal-based methodology that may be utilized for providing these corporate accounting services. Please note that the last two characters of rate codes for causal-based and common allocators is not the entity code as it is with the direct methodology, but rather the sequential numbering of rate codes for the combinations of subsidiaries and business segments.

For a listing of the allocation methodologies used as the basis for the applicable rate codes, please refer to the ESC FERC Form 60 annual filings that present these methodologies on Schedule XXI. This Schedule also explains the rationale for the methodologies. Please refer to EOE-066, Attachment 1, for the ESC Cost Allocation Manual and additional details regarding the allocation methodologies as well as a list of rate codes.

Variable pay and employee benefits "follow productive labor charging" to ensure that each employee's total labor in a calendar year is accounted for and charged to the appropriate Eversource Energy companies/business segments based on the "productive" work performed by each employee. The accounting processes ensure the appropriate 'cost of labor' charge for each employee, including variable pay and employee benefits, follow the assignment of costs to the subsidiaries/business segments based on the productive work orders.

Shared Service Controls and Reporting

There are several controls in place to ensure costs are appropriately allocated. All rate codes are updated annually in January, and as needed, and are prepared, reviewed and approved by the Corporate Accounting Allocations team. The Director of the Corporate Accounting Allocations team is responsible for ensuring the corporate rate codes are accurate.

As it relates to the allocation or assignment of costs, whether those costs be employee payroll, invoiced charges, inventory or otherwise, the person authorized to approve the transaction is responsible for ensuring the appropriate work order and rate code are used to cause the cost to be allocated to the proper affiliate(s) depending on the subsidiaries or business segments benefitting from the goods or services provided.

In addition, the internal control structure used by ESC to ensure all costs are properly charged to the affiliates includes a process that is managed by the Corporate Accounting Allocations team. This process involves comparing the allocated charges to a manual calculation of charges eligible to be allocated to the subsidiaries or business segments. Any differences are researched and resolved.

The Corporate Allocations Team also sends out a Monthly Monitoring Report from the PowerPlan system, which houses the enterprise-wide ESC cost records. The Monthly Monitoring Report is a set of approximately 400 reports issued to all ESC Cost Center Managers, or their designees for each ESC cost center. The Monthly Monitoring Report shows the amount of operations and maintenance ("O&M") expense charged by accounting work order and the percentage by work order charged to each Operating Company. The Corporate Allocations Team also sends out a monthly Key Comparison Report that shows the percentage of O&M expense charged to each subsidiary for the current and prior month, quarter to date and the prior 12 months. The Key Comparison Report also shows the total charge to each Operating Company in that current month.

An executive summary is also prepared monthly for the Vice President, Controller and Chief Accounting Officer. This report shows a 13-month comparative analysis of ESC O&M allocated to each Operating Company by each shared service unit through the Executive Vice President level and identifies month-over-month variances within each business area.

Date Filed: August 28, 2026

Witness: Sasha Lazor
Request from: Office of Consumer Counsel

Question:

(PAY INCREASES) Please provide the base salary increases (by percentage and dollar amount) for non-union employees and executives for each year from 2018 to the present.

Response:

Below is the merit budget percentage and dollar from 2018 to 2024. Please note that this is at the Eversource level.

Year	Merit Budget (%)	Merit Budget ($)
2018	3.0%	$11,877,712
2019	3.0%	$12,700,826
2020	3.0%	$14,486,079
2021	3.0%	$14,567,179
2022	3.0%	$16,003,993
2023	3.0%	$17,947,055
2024	3.0%	$19,471,269

Date Filed: August 28, 2026

Witness: Sasha P. Lazor and Marianne H. Eichler
Request from: Office of Consumer Counsel

Question:

(VARIABLE PAY) Please provide the data in Exhibit-CLP-EMPLOYEE-3, for each year from 2018 through 2024, separated by year.

Response:

Please refer to OCC-201, Attachment 1, for each year from 2018 through 2024, separated by year.

Date Filed: August 28, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: Office of Consumer Counsel

Question:

(COMPENSATION) Please provide an unlocked Excel spreadsheet, showing in individual tabs for each year from 2018 through the present each Company employee and executive's pay, separated into base pay, variable pay, benefits, any other compensation provided to the employee (e.g., stocks, options, etc…), the total all-in pay for that year, and the percentage allocated to CL&P customers. This exhibit may include job titles rather than employee names, but please number each position to allow the individual in the position to be tracked across all years.

Response:

Please refer to OCC-202, Attachment 1, for each Eversource Service Company ("ESC") employee allocated base salary, total variable compensation and total indirect costs attributed to CL&P for 2023 through June 2026. The Company also provided the ESC percentage allocated to CL&P customers.

It is typical for ESC employees to charge their time to multiple operating companies throughout the year, and therefore the Company takes the ESC compensation and allocates a portion of the costs to CL&P. In columns (e) through (g) of OCC-202, Attachment 1, represents the dollars allocated to CL&P in the cost of service of this proceeding. Additionally, the compensation for the Company's CEO, CFO, and CL&P President were removed from the cost of service, as discussed in Exhibit CLP-REVREQ-2 at 74, showing zero dollars in columns (e) through (g) of OCC-202, Attachment 1. While the Company's CEO, CFO and CL&P President's compensation are excluded from the rate case, the Company's CEO, CFO and CL&P President continues to allocate costs to CL&P's as normal part of business operations and business for the benefit of our customers, as referenced in column (i) of OCC-202, Attachment 1.

Please refer to OCC-202, Attachment 2, for each CL&P employee base salary, total variable compensation, and total indirect costs attributed to CLP for 2023 through June 2026. Note the CL&P employees charge 100 percent of their time to CL&P.

Conducting this detailed analysis for years prior to 2023 requires substantial work to extract this particular detail for older historical years, which is not warranted given that the resulting information is outdated. The Company will supplement these responses as the older historical information becomes available.

Date Filed: August 21, 2026

Witness: Kara A. O'Connor
Request from: Office of Consumer Counsel

Question:

(EMPLOYEE HEALTH INSURANCE) Please refer to Exhibit CLP-EMPLOYEE-1, p. 65. Does the Company permit employee family members to enroll as part of the employee's health insurance if the family member has alternate health insurance coverage (e.g., the employee's spouse has coverage from their employer)?

Response:

The Company does permit eligible family members (legal spouses and dependent children under age 26) to participate in the health insurance plan regardless of whether they have access to alternate health insurance coverage. However, the Eversource health plan pricing strategy is designed to extend employees the option of electing to cover their dependents by paying a higher percentage of the premium cost as compared to employee-only coverage.

Date Filed: August 28, 2026

Witness: Kara A. O'Connor
Request from: Office of Consumer Counsel

Question:

(BENEFITS) Please refer to Exhibit CLP-EMPLOYEE-1.

a. Does the Company offer any employee benefits not discussed in the testimony (e.g., dependent care benefits, pet care, pet insurance, etc…)? If yes, please describe all benefits.
b. Please provide on unlocked Excel spreadsheet showing on an annual basis from 2018 to the present the total cost associated with each employee benefit (e.g., health insurance, dental insurance, vision insurance, retirement savings, etc…).

Response:

a. The Company offers certain voluntary benefits to employees that include legal, home and auto insurance, student loan refinancing and identity theft protection. The Company incurs no expense for these plans, but makes them available to employees and in certain circumstances, facilitates payroll deductions for payment as employees can receive better insurance rates via payroll deduction.

b. The Company provided the data for the 5-year historical period 2021 through 2025 in its initial application (see Exhibit CL&P-REVREQ-3) and does not have information prior to 2021 readily available for this response. Please refer to OCC-204, Attachment 1, for Employee Benefit program costs from 2021 to the present.

Date Filed: August 21, 2026

Witness: Kara A. O'Connor
Request from: Office of Consumer Counsel

Question:

(MEDICAL INSURANCE COSTS) Please refer to Exhibit CLP-EMPLOYEE-1, Table 13. Has the Company identified a cause for the general downward trend in medical insurance costs from 2017 through 2023 and the significantly upward trend from 2023 through 2026? If yes, please explain.

Response:

There are several factors that contributed to the general downward trend in medical insurance costs from 2017 through 2023, as well as the subsequent upward trend from 2023 through 2026.

The reduction in medical insurance costs observed from 2017 through 2023 resulted from a combination of Eversource-sponsored cost management initiatives and favorable market conditions. Key factors included:

- **Medical carrier change implemented in 2019.** Eversource transitioned to a new medical carrier (BCBSMA) in 2019, which provided access to more competitive provider discounts, enhanced care management programs, and improved network economics. These changes contributed to lower overall claim costs relative to prior years.

- **Migration toward Eversource's high-deductible health plan (Saver Plan).** Over time, due in large part to robust communication efforts from Eversource, employees increasingly elected Eversource's **high-deductible health plan (Saver Plan)** option. This gradual migration reduced plan costs through lower claims cost and increased member engagement in healthcare purchasing decisions.

- **Lower healthcare utilization during the COVID-19 pandemic.** Beginning in 2020, many elective procedures, preventive services, and non-urgent healthcare visits were postponed or canceled. This temporary reduction in utilization contributed to lower healthcare expenditures during portions of the 2020-2022 period.

- **Favorable claims experience.** Like all self-funded employers, annual costs are influenced by fluctuations in high-cost claimant activity, specialty drug utilization, and overall healthcare demand. Certain years within this period experienced relatively favorable claims results, contributing to lower aggregate costs.

The increase in medical insurance costs from 2023 through 2026 is attributable primarily to broader healthcare inflationary pressures and post-pandemic changes in healthcare utilization patterns affecting employers nationwide. Key factors include:

- **Rebound and normalization of healthcare utilization following the pandemic.** Healthcare services deferred during the pandemic increasingly returned to pre-pandemic levels, resulting in higher utilization across inpatient, outpatient, and physician services including behavioral health services.

- **General medical cost inflation.** Healthcare providers have experienced increasing labor, supply, and operating costs, which have translated into higher prices for medical services and corresponding increases in employer healthcare costs.

- **Growth in pharmacy spending.** Specialty medications, prescription drugs used to treat cancer, complex, chronic and rare conditions that require special handling, continue to represent a significant share of healthcare expenditures. Increased utilization and higher costs associated with specialty therapies have materially contributed to cost growth. Also, non-specialty prescription drugs saw growth in costly therapies, such as GLP-1 medications used to treat diabetes and obesity have increased significantly in recent years. These medications have substantially affected pharmacy and total healthcare spend.

- **Increased prevalence and intensity of high-cost claims.** The healthcare market has experienced growth in the frequency and severity of catastrophic claims, including complex cancer treatments, gene and cell therapies, neonatal care, and other advanced medical interventions.

In summary, the declining costs through 2023 were primarily driven by a combination of carrier and plan management initiatives, migration toward lower-cost plan options, and temporary pandemic-related utilization reductions. The upward trend beginning in 2023 is largely attributable to healthcare inflation, increased utilization, pharmacy cost growth, and other market-wide factors that have affected employer-sponsored healthcare plans broadly.

Date Filed: August 21, 2026

Witness: Brendan J. O'Brien, Garrett J. Murray, Sasha P. Lazor and Marianne H. Eichler
Request from: Office of Consumer Counsel

Question:

(EMPLOYEE GOALS) Please refer to Exhibit CLP-EMPLOYEE-4B.

a. Please confirm that each of the employees listed was compensated by CL&P and the Company is seeking recovery of their compensation from CL&P customers.

b. If yes to (a), please explain how each of the tasks/goals listed benefited CL&P customers. (e.g., how did preparing for the Aquarion rate case benefit CL&P customers?)

Response:

a. Yes. Each of the employees listed in Exhibit CLP-EMPLOYEE-4B is employed either by CL&P or by Eversource Energy Service Company ("ESC") and each listed employee works for CL&P, in whole or in part, depending on their job function and whether they are directly employed by CL&P, or whether they work for ESC and provide shared services. In this proceeding, the Company's proposed cost of service is comprised of a representative level of cost reflecting the employee time working only on behalf of CL&P customers.

   Exhibit CLP-EMPLOYEE-4C provides a representative sampling of 40 individual employee goal reports, 19 of which are associated with CL&P employees and 21 of which are associated with ESC employees. This sampling of goals demonstrates the linkage to CL&P customers.

b. Exhibit CLP-EMPLOYEE-4B provides a sampling of 15 executive scorecards. This group is comprised of vice presidents and above – all but one of whom are employed by ESC and have responsibilities shared across all operating affiliates, including CL&P. As a result, the employees of these executive managers have departmental goals within the purview of the respective work streams managed by these executives that support CL&P and its customers directly, or that provide support to CL&P and its customers on a shared basis with other operating affiliates. The remaining vice president (Vice President Electric System Operations) is an employee of CL&P whose departmental goals exclusively support the Company.

   Because most of the primary functions of the operating affiliates are performed on a shared basis (i.e., 14 out of 15 groups headed by an executive manager), the "departmental" goals

will overlay multiple affiliates. Departmental goals are cascaded from the executive manager to the staff within that department; however, only the portion of each employee's compensation (base and variable) that is chargeable to CL&P is included in the Company's cost of service in this proceeding. On this point, please note that Exhibit CLP-EMPLOYEE-4B describes departmental performance goals, not the individual goals for each employee in the department, nor the actual variable compensation payouts to individual employees. The Company is indexing the departmental goals listed for the 40 CL&P and ESC employees in a manner that will show the connection to CL&P customers and will provide that analysis as a supplement to this response.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 370.50) Referring to Exhibit CLP-Depreciation-3, pages 130-131. How did the Company determine an IOWA 10-S3 curve is appropriate curve if FERC Account 370.50 Electric Vehicle Charging Station had no retirements.

Response:

For accounts for which there is limited retirement activity, other factors are given more consideration than the statistical analysis. The estimate for Electric Vehicle charging stations is based on an understanding of the assets, Company expectations, recommendations from manufacturers and the estimates for similar property for other utilities. The physical and operating characteristics of electric vehicle charging stations, as well as the potential for obsolescence, support a 10-year average service life.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 371.00) Referring to Exhibit CLP-Depreciation-3, page 132. What is FERC Account 371.00 "Installations on Customers' Premises" and provide examples of the assets?

Response:

FERC Account 371.00 is used to record the cost of Company-owned equipment installed at customer or municipal locations to provide specific electric service, primarily outdoor and street lighting service. Examples of assets recorded in this account include streetlight and floodlight luminaires, poles, conductors, transformers and other associated lighting equipment.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 371.00) Referring to Exhibit CLP-Depreciation-3, page 132. Provide an IOWA 30-L0 on the graph in red.

Response:

Please refer to OCC-209, Attachment 1, which provides the requested 30-L0 Iowa Survivor Curve on the chart in red.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 371.00) Referring to Exhibit CLP-Depreciation-3, page 132. Provide an IOWA 20-L2 on the graph in blue.

Response:

Please refer to OCC-210, Attachment 1, which provides the requested 20-L2 Iowa Survivor Curve on the chart in blue.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 373.00) Referring to Exhibit CLP Depreciation-3, page 141. Provide an IOWA 22-L0 on the graph in red.

Response:

Please refer to OCC-211, Attachment 1, which provides the requested 22-L0 Iowa Survivor Curve on the chart in red.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

IOWA Curve-ACCT 390.10) Referring to Exhibit CLP Depreciation-3, page 148. Provide an IOWA 50-R1.0 on the graph in red.

Response:

Please refer to OCC-212, Attachment 1, which provides the requested 50-R1 Iowa Survivor Curve on the chart in red.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.10) Referring to Exhibit CLP Depreciation-3, page 155. Provide examples of what FERC Account 392.10 Transportation Equipment – Class 1 (CARS) the company would utilize.

Response:

Examples of transportation equipment included in FERC Account 392.10 include passenger vehicles, sport utility vehicles, hybrid and electric vehicles and light-duty cargo/service vans used in Company operations, such as meter reading, supervisor transportation and customer disconnects.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.10) Referring to Exhibit CLP Depreciation-3, page 155. Provide an IOWA 10-L3 on the graph in red.

Response:

Please refer to OCC-214, Attachment 1, which provides the requested 10-L3 Iowa Survivor Curve on the chart in red.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.13) Referring to Exhibit CLP Depreciation-3, page 161. Provide an IOWA 10-S1.0 on the graph in red.

Response:

Please refer to OCC-215, Attachment 1, which provides the requested 10-S1 Iowa Survivor Curve on the chart in red.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.14) Referring to Exhibit CLP Depreciation-3, page 163. Provide an IOWA 14-S3 on the graph in red.

Response:

Please refer to OCC-216, Attachment 1, which provides the requested 14-S3 Iowa Survivor Curve on the chart in red.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.14) Referring to Exhibit CLP Depreciation-3, page 163. Provide an IOWA 12-S2 on the graph in blue.

Response:

Please refer to OCC-217, Attachment 1, which provides the requested 12-S2 Iowa Survivor Curve on the chart in blue.

Date Filed: August 19, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(Statistics Depreciation) Referring to Exhibit CLP Depreciation-3, page 173. What computer programs did the Company run or analyze net salvage statistics on?

Response:

The net salvage statistics set forth in Part VIII of Exhibit CLP-DEPRECIATION-3, starting at page 173, were generated using Gannett Fleming Valuation and Rate Consultants, LLC's proprietary deprecation software.

Date Filed: August 21, 2026

Witness: Ned W. Allis and Marisa B. Paruta
Request from: Office of Consumer Counsel

Question:

(Cost of Removal) Referring to Exhibit CLP Depreciation-3, page 178, Year 2023, "Cost of Removal Amount" column, number 13,097,695. Provide support for the number "13,097,695".

Response:

Please refer to OCC-219, Attachment 1 ("Attachment 1"), which supports Exhibit CLP-DEPRECIATION-3, at Page 178, Year 2023, "Cost of Removal Amount" column, totaling $13,097,695. Attachment 1 is a standard report (DEPR-1100) out of the Company's fixed asset accounting module, Powerplan. Attachment 1 provides the projects / work orders closed and unitized to Utility Account 364310 that had an associated cost of removal or recoveries from insurance companies (third-party damage claims recovered from wrongdoers). These amounts are functionally recorded to FERC Account 108 and attributed to the net salvage value in Vintage Year 2023 for Utility Account 364310. The Company notes that Column G in Attachment 1 is titled "Cost of Removal;" however, Column G does encompass both Cost of Removal charged to the work order and Insurance Reimbursements credited to the work order. For rate base and depreciation study purposes, and in accordance with the FERC Uniform System of Accounts, Cost of Removal, Gross Salvage, and Recoveries from Insurance Claims are all functionally classified in FERC Account 108 and part of a depreciation study's net salvage amount.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(Net Salvage Percent) Referring to Exhibit CLP Depreciation-3, page 219. How did the Company determine the Net Salvage Percent as 0?

Response:

The net salvage estimate of 0% associated with Account 363.32, Communication Equipment – Microwave, is consistent with the 0% net salvage estimate reflected in CL&P's previous depreciation study for Account 397.73, which is where these assets were previously accounted for prior to FERC Order 898, and reflects the Company's current expectations related to net salvage associated with the assets recorded in this Account. There is limited available historical data, and so this supports a continued use of a 0% net salvage.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(Net Salvage Percent) Referring to Exhibit CLP Depreciation-3, page 220. How did the Company determine the Net Salvage Percent as –100?

Response:

As discussed in "PART IV NET SALVAGE CONSIDERATIONS" of Exhibit CLP-DEPRECIATION-3, the net salvage estimates were based on judgment that incorporated analyses of historical cost of removal and salvage data, expectations with respect to future removal requirements and markets for retired equipment and materials. CL&P's Deprecation Study as of December 31, 2016 reflected a conservative net salvage estimate of negative 90% based on an overall negative 123% net salvage and the most recent 5-year average of negative 130%. CL&P's Depreciation Study in the instant case includes updated net salvage activity through December 31, 2025, which continues to indicate more negative levels of net salvage at an overall level of negative 128%, as disclosed on page 178 of Exhibit CLP-DEPRECIATION-3, and the most recent 5-year average of negative 134%, as disclosed on page 179 of Exhibit CLP-DEPRECIATION-3. The negative 100% net salvage estimate reflected in the current Depreciation Study is reflective of these more negative net salvage costs, though is conservative relative to the levels CL&P has incurred in the historical data.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(Survivor Curve Changes) Referring to Exhibit CLP Depreciation-4, page 1. FERC Account 364.00, Distribution Plant "POLES, TOWERS AND FIXTURES". What caused the company to propose a decreased survivor curve of 48-R0.5 compared to current survivor curve 53-R0.5?

Response:

First, it is important to recognize the 53-R0.5 Iowa Survivor Curve is the result of a settlement, not what was proposed in the prior Depreciation Study as of December 31, 2016, as most reflective of the expectations for these assets as of December 31, 2016. The Iowa Survivor Curve proposed in the prior Depreciation Study was the 50-R0.5.

The plant activity recorded since December 31, 2016, which is reflected on pages VII-28 through VII-34 of Exhibit CLP-DEPRECIATION-3, at pages 82-88, indicates a shorter service life than in the previous study and when compared to the current 53-R0.5 estimate. The 48-R0.5 Iowa Survivor Curve, shown on page VII-28 of the Depreciation Study, provided at Exhibit CLP-DEPRECIATION-3, at page 82, is a very good fit to the historical retirement activity through age 54 and reflects the expectation that a substantial portion of the future retirements recorded to assets in this Account will be made to assets of ages greater than 54 years. This estimate also incorporates increasing levels of replacements for reasons such as reliability, capacity, and pole inspections.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 364.00-Current) Referring to Exhibit CLP-Depreciation-3, pages 82. Provide an IOWA 53-R0.5 on the graph in purple.

Response:

Please refer to OCC-223, Attachment 1, which provides the requested 53-R0.5 Iowa Survivor Curve on the chart in purple.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(Net Salvage Percent) Referring to Exhibit CLP Depreciation-4, page 1. FERC Account 364.00, Distribution Plant "POLES, TOWERS AND FIXTURES". What caused the Company to decrease net salvage percent from (90) to (100)?

Response:

Please refer to the Company's response to information request OCC-221[i].

Prior Referenced Response:

[i] OCC-221 Question:
(Net Salvage Percent) Referring to Exhibit CLP Depreciation-3, page 220. How did the Company determine the Net Salvage Percent as –100?

OCC-221 Response:
As discussed in "PART IV NET SALVAGE CONSIDERATIONS" of Exhibit CLP-DEPRECIATION-3, the net salvage estimates were based on judgment that incorporated analyses of historical cost of removal and salvage data, expectations with respect to future removal requirements and markets for retired equipment and materials. CL&P's Deprecation Study as of December 31, 2016 reflected a conservative net salvage estimate of negative 90% based on an overall negative 123% net salvage and the most recent 5-year average of negative 130%. CL&P's Depreciation Study in the instant case includes updated net salvage activity through December 31, 2025, which continues to indicate more negative levels of net salvage at an overall level of negative 128%, as disclosed on page 178 of Exhibit CLP-DEPRECIATION-3, and the most recent 5-year average of negative 134%, as disclosed on page 179 of Exhibit CLP-DEPRECIATION-3. The negative 100% net salvage estimate reflected in the current Depreciation Study is reflective of these more negative net salvage costs, though is conservative relative to the levels CL&P has incurred in the historical data.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(Accrual Amount – Column 10 Calc) Referring to Exhibit CLP Depreciation-4, page 1. FERC Account 363.32, Distribution Plant "COMMUNICATION EQUIPMENT - MICROWAVE". How did the Company calculate an Accrual amount of 98,066 in column 10?

Response:

Please refer to pages IX-7 and IX-8 of the Depreciation Study provided at Exhibit CLP-DEPRECIATION-3, at pages 208-209. The $98,066 annual accrual amount is the sum of the annual accruals for each vintage shown in Column 7. The annual accruals for each vintage are equal to the future book accruals in Column 5 divided by the composite remaining life in Column 6. The Future Accruals are equal to the original cost less net salvage less book accumulated depreciation for each vintage.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(Land Rights) Referring to Exhibit CLP Depreciation-4, page 1. FERC Accounts 360.20 and 389.20. Why are land rights considered depreciable plant and nondepreciable plant?

Response:

Land rights have a finite life and limited residual value at the end of their useful lives, which contrasts with land that typically has a value (which normally appreciates rather than depreciates) and an indefinite life. As a result, the costs of land rights are consumed during the course of utility operations and should be allocated over their expected useful lives (net of any salvage) through depreciation expense.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(FERC ACCT 390.20) Why is Structures and Improvements – Simsbury considered nondepreciable plant?

Response:

FERC Account 390.20, Structures and Improvements – Simsbury, is considered nondepreciable plant as the account is fully depreciated with a zero net-book value and no future accruals are expected.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 362.00-Current) Referring to Exhibit CLP-Depreciation-3, page 67. Provide an IOWA 60-S0 on the graph in purple.

Response:

Please refer to OCC-228, Attachment 1, which provides the requested 60-S0 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 365.00-Current) Referring to Exhibit CLP=Depreciation-3, page 89. Provide an IOWA 52-R0.5 on the graph in purple.

Response:

Please refer to OCC-229, Attachment 1, which provides the requested 52-R0.5 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 366.00-Current) Referring to Exhibit CLP-Depreciation-3, page 96. Provide an IOWA 75-R2 on the graph in purple.

Response:

Please refer to OCC-230, Attachment 1, which provides the requested 75-R2 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 367.00-Current) Referring to Exhibit CLP-Depreciation-3, page 103. Provide an IOWA 53-R0.5 on the graph in purple.

Response:

Please refer to OCC-231, Attachment 1, which provides the requested 53-R0.5 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 370.47-Current) Referring to Exhibit CLP-Depreciation-3, page 124. Provide a purple IOWA 23-L1 on a graph containing only FERC ACCT 370.47 placements in black.

Response:

Please refer to OCC-232, Attachment 1, which sets forth the requested 23-L1 Iowa Survivor Curve in purple on the graph provided in response to OCC-094[i] reflecting only Account 370.47 original curve experience.

Prior Referenced Response:

[i] OCC-094 Question:
(IOWA Curve-ACCTs 370.47) Referring to Exhibit CLP-Depreciation-3, pages 124. Plot only ACCT 370.47 original curve experience placements on the graph. The black boxes.

OCC-094 Response:
Please see OCC-094, Attachment 1, which provides the requested original curve for Account 370.47 only.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 370.48-Current) Referring to Exhibit CLP-Depreciation-3, page 124. Provide a purple IOWA 23-L1 on a graph containing only FERC ACCT 370.48 placements in black.

Response:

Please refer to OCC-233, Attachment 1, which sets forth the requested 23-L1 Iowa Survivor Curve in purple on the graph provided in response to OCC-095[i] reflecting only Account 370.48 original curve experience.

Prior Referenced Response:

[i] OCC-095 Question:
(IOWA Curve-ACCTs 370.48) Referring to Exhibit CLP-Depreciation-3, pages 124. Plot only ACCT 370.48 original curve experience placements on the graph. The black boxes.

OCC-095 Response:
Please see OCC-095, Attachment 1, and OCC-095, Attachment 2, which provide the requested original curves for Account 370.48 with the Bridge Meters segregated consistent with Exhibit CLP-DEPRECIATION-3.

Date Filed: August 21, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(Life Span Method) Referring to Exhibit CLP-Depreciation-3, page 124 and Exhibit CLP Depreciation-4, page 2. Why did the Company use the life span method instead of an IOWA curve?

Response:

The assets reflected in the analysis presented on page VII-70 of Exhibit CLP-DEPRECIATION-3 include an interim retirement component that incorporates the 20-S0 Iowa Survivor Curve. However, as the Company transitions to smarter meter technology, these assets are expected to be retired by the end of the year 2030 consistent with the probable retirement date of 12-2030 as presented in Exhibit CLP-DEPRECIATION-4. For this reason, the life span method using this date is most appropriate for the assets in this account.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 370.48-Current) Referring to Exhibit CLP-Depreciation-3, page 128. Provide an IOWA 23-L1 on the graph in purple.

Response:

Please refer to OCC-235, Attachment 1, which provides the requested 23-L1 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 373.00-Current) Referring to Exhibit CLP-Depreciation-3, page 141. Provide an IOWA 25-L0 on the graph in purple.

Response:

Please refer to OCC-236, Attachment 1, which provides the requested 25-L0 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.10-Current) Referring to Exhibit CLP-Depreciation-3, page 155. Provide an IOWA 7-L2.5 on the graph in purple.

Response:

Please refer to OCC-237, Attachment 1, which provides the requested 7-L2.5 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.11-Current) Referring to Exhibit CLP-Depreciation-3, page 157. Provide an IOWA 10-S2 on the graph in purple.

Response:

Please refer to OCC-238, Attachment 1, which provides the requested 10-S2 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.12-Current) Referring to Exhibit CLP-Depreciation-3, page 159. Provide an IOWA 12-S2 on the graph in purple.

Response:

Please refer to OCC-239, Attachment 1, which provides the requested 12-S2 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.13-Current) Referring to Exhibit CLP-Depreciation-3, page 161. Provide an IOWA 14-S1.5 on the graph in purple.

Response:

Please refer to OCC-240, Attachment 1, which provides the requested 14-S1.5 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.14-Current) Referring to Exhibit CLP-Depreciation-3, page 163. Provide an IOWA 12-S2.5 on the graph in purple.

Response:

Please refer to OCC-241, Attachment 1, which provides the requested 12-S2.5 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.15-Current) Referring to Exhibit CLP-Depreciation-3, page 165. Provide an IOWA 20-L2 on the graph in purple.

Response:

Please refer to OCC-242, Attachment 1, which provides the requested 20-L2 Iowa Survivor Curve on the chart in purple.

Date Filed: August 20, 2026

Witness: Ned W. Allis
Request from: Office of Consumer Counsel

Question:

(IOWA Curve-ACCT 392.89-Current) Referring to Exhibit CLP-Depreciation-3, page 168. Provide an IOWA 25-S3 on the graph in purple.

Response:

Please refer to OCC-243, Attachment 1, which provides the requested 25-S3 Iowa Survivor Curve on the chart in purple.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 7. Provide support for the claim hazard trees are responsible for approximately 76% of tree failure-related customer outages experienced across the operating year.

Response:

From January 6, 2023 through April 20, 2026, the Company's Connecticut licensed and trained Arborists performed 1,229 outage investigations pertaining to customer interruptions on blue sky or non-storm days. Of the 1,229 outage investigations, 686 were caused by whole-tree failure and, of that number, a total of 522 (76%) of these instances were determined to be caused by hazard trees.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 8. Provide support for the claim Company has experienced declining tree health in Connecticut over the past several years.

Response:

Please refer to exhibit CLP-VMP-1 page 47, at lines 10-20. The trees in Connecticut have been impacted by many meteorological and biotic factors over the last several years. These issues include repeated droughts, polar vortexes, bombogenesis, Nor'easters, microbursts, tornados, tropical storms, hurricanes, the Emerald Ash Borer ("EAB"), Spongy Moth, spotted lantern fly, and beech leaf disease. EAB infestation is of particular concern given the manner in which it affects ash trees, the fact that there is no "cure" after the infestation, and the 100 percent mortality and failure rate of infested ash trees. Trees may be treated with pesticide before infestation, but it must be done annually, and the amount of pesticide is dependent on the size of the tree. Few tree owners have made the decision to proactively treat trees. The residual effect of these influential factors are more trees that are standing dead or in declining health along the roadside forest and within reach of the Company's lines.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 8. Give a list of actual examples for persistent number of trimming refusals, modifications and non-responses in relation to the Company's trimming notifications.

Response:

Please refer to OCC-246, Attachment 1, for the refusals, modifications, and non-responses filed for the years 2022-2025, as required by PURA Docket No. 21-12-31.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 8. Provide support for the claim the Company has experienced increased severity and frequency of strong weather systems as compared to the storm impact over the last 26 years.

Response:

This statement reflects the Company's observation that weather conditions affecting its electric distribution system have become increasingly challenging over time. This observation is supported by multiple, complementary sources of information, including independent climate research specific to Connecticut and the Northeast, documented changes in Connecticut's vegetation and forest environment and the Company's own operating experience.

Because the characteristics, timing, location and impact are different for every weather event, the Company does not define a "strong storm" solely by a particular wind speed, precipitation amount, or number of customer outages. Rather, the operational impact of a weather system is the result of multiple interacting factors, including wind speed and duration, precipitation intensity, soil saturation, snow or ice loading, lightning, antecedent weather conditions, vegetation health and condition, and the location of trees and other vegetation relative to electric facilities.

Independent Climate Data
Independent scientific assessments demonstrate that Connecticut and the broader Northeast are experiencing measurable changes in climate and certain types of extreme weather. Please refer to OCC-247, Attachment 1. The *Connecticut Physical Climate Science Assessment Report* found that previous studies of the Northeast document an observed increase in precipitation and in the frequency and intensity of heavy precipitation events. The report further explains that more than 75 percent of extreme precipitation days in the Northeast are associated with extratropical storms, except during September, when tropical storms account for more than 50 percent.

Connecticut-specific observations similarly show changes in precipitation patterns. Please refer to OCC-247, Attachment 2. NOAA's *Connecticut State Climate Summary 2022* reports that annual and summer precipitation have generally been above average since the 1970s and that the greatest number of days with two inches or more of precipitation occurred during the 2005–2009 and 2010–2014 periods. NOAA also projects increases in annual precipitation and in the number of extreme precipitation events, noting that these changes may increase inland and coastal flooding risks.

The Fifth National Climate Assessment[1] provides additional national and regional context. This assessment concludes that climate change is increasing the frequency and severity of a number of extreme weather and climate events, including heavy precipitation and flooding.

These findings do not mean that every individual storm affecting Connecticut is stronger than storms occurring historically, nor is the Company relying on that proposition. Rather, the occurrence of these weather patterns demonstrate that the underlying weather environment in which the Company's electric system operates is changing, including changes in weather variables that can materially affect an overhead electric distribution system.

Vegetation and Antecedent Environmental Conditions

Weather alone does not determine the resulting impact on the electric system. This distinction is particularly important in Connecticut because of the significant interaction between the State's overhead electric infrastructure and its heavily forested environment. Weather conditions, antecedent soil conditions, and vegetation health can interact in ways that affect the likelihood of trees or limbs contacting electric facilities.

Connecticut's forest environment has itself experienced significant health stresses during the period relevant to this interrogatory. Please refer to OCC-247, Attachment 3. The Connecticut Agricultural Experiment Station's ("CAES") *2024 Forest Health Highlights* documented 82,214 acres of new forest damage during its 2024 aerial survey, including damage associated with beech leaf disease, spongy moth, white pine needle disease and emerald ash borer. CAES further cautioned that aerial surveys likely underestimate the actual extent of certain forest-health impacts.

Several of these forest-health threats emerged or expanded substantially during the period examined by the Company. Emerald ash borer was first detected in Connecticut in 2012 and subsequently spread throughout the State. In CAES's 2024 sampling, 314 of 387 ash trees were dead, and at sampled locations where emerald ash borer was first detected in 2012 or 2013, CAES found no living overstory or midstory ash trees. Beech leaf disease, first detected in Connecticut in 2019, subsequently spread throughout the State and has resulted in substantial deterioration in the condition and growth of affected beech trees.

These forest-health conditions demonstrate that the environment affected by weather systems has also changed. This distinction is important when evaluating impacts to an overhead electric distribution system. Heavy or prolonged precipitation can contribute to soil saturation; wind acting upon trees rooted in saturated soils may produce different consequences than similar winds

[1] https://toolkit.climate.gov/NCA5_2023_FullReport

under dry conditions; and dead, diseased or otherwise stressed trees may respond differently to those same weather conditions than healthy trees.

Accordingly, the ultimate impact of a weather system cannot necessarily be determined from a single meteorological variable, such as peak wind speed. Weather severity, antecedent conditions, vegetation health and electric-system exposure interact to determine the ultimate system impact.

Company Operating Experience

The Company's historical operating experience provides another, complementary perspective. Whereas climate and environmental studies describe changes occurring in Connecticut's weather and natural environment, the Company's outage-event data provide a means of evaluating how frequently weather conditions are producing operationally significant impacts on the electric system.

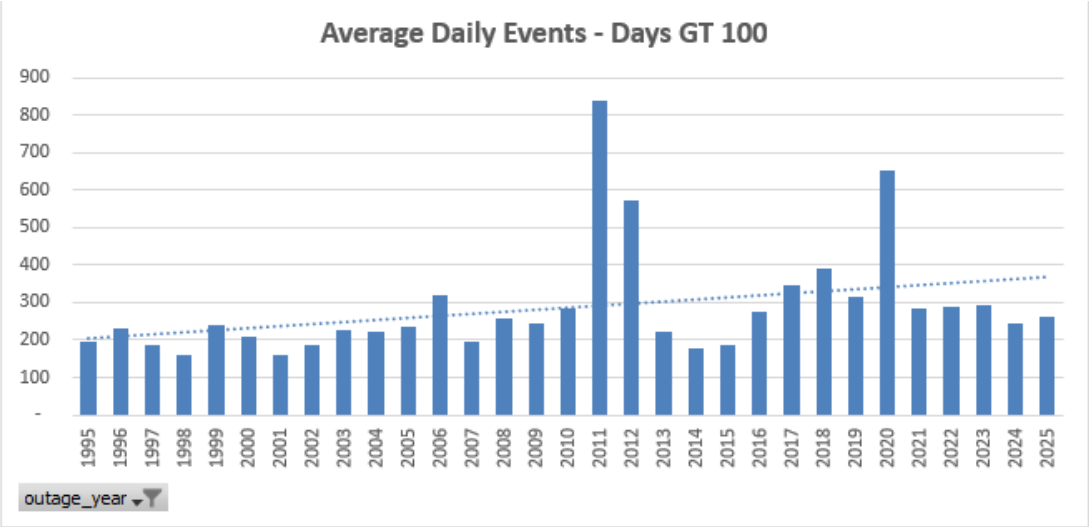
For purposes of this analysis, the Company has reviewed the frequency of days experiencing more than approximately 100 outage events. The Company does not use 100 outage events as a meteorological definition of a "strong storm," nor does reaching that level necessarily constitute activation of the Company's Emergency Response Plan. This level of outage events is simply a level of outages that would not be expected on a blue sky day and that would generally need to be provoked by an external weather impact, or other force. That is, approximately 100 outage events represents an operationally meaningful reference point because, at approximately that level of system impact, the Company's normal operating and staffing structure generally begins to require adjustment.

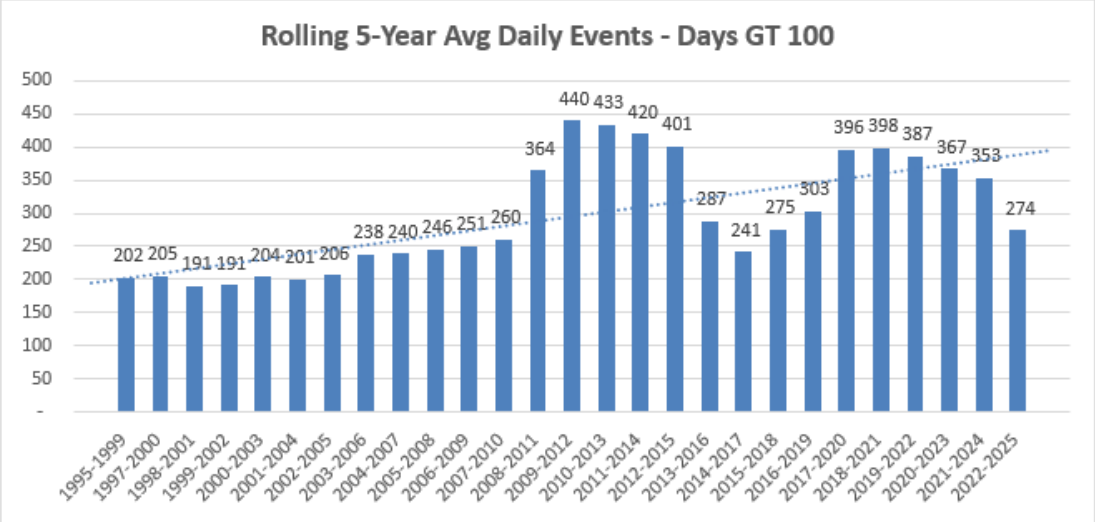
Under normal conditions, resources such as Response Specialist Organization personnel and lineworkers are allocated among outage response, corrective maintenance, capital work, and other normal operations. As outage-event volume increases, additional personnel may need to be redirected from their normal assignments to restoration activities, staffing structures may need to be supplemented, and additional coordination and operational support may become necessary.

The precise point at which these actions occur is dynamic and depends upon factors including the geographic distribution and complexity of outages, expected weather duration, damage conditions, available resources, and forecast conditions. Nevertheless, approximately 100 outage events provides a reasonable and consistent reference point for examining the frequency with which weather affects the system sufficiently to cause the Company to move beyond its ordinary operating posture.

The Company's review of its historical operating data shows an increasing trend in the number of days on which the electric system experiences more than 100 outage events, including a clear upward trend. Additionally, a comparison of the rolling five-year average of days with greater than 100 outage events also shows a clear upward trend. This information is relevant because it

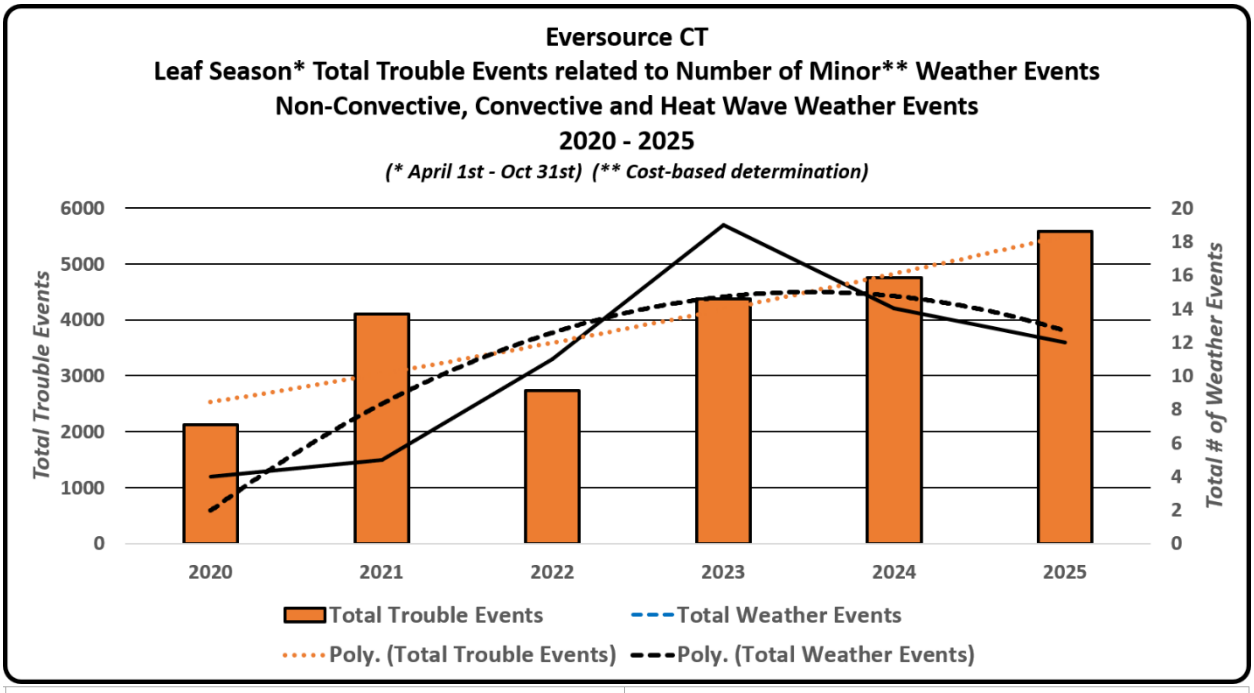
measures the consequence of weather from an electric-system operations perspective rather than attempting to characterize storm strength through a single meteorological variable.

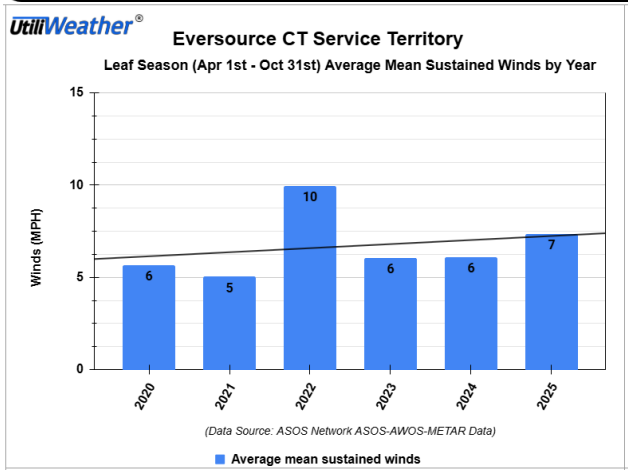


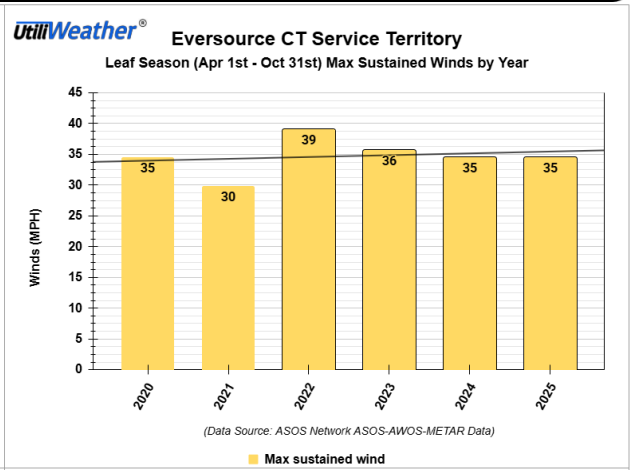


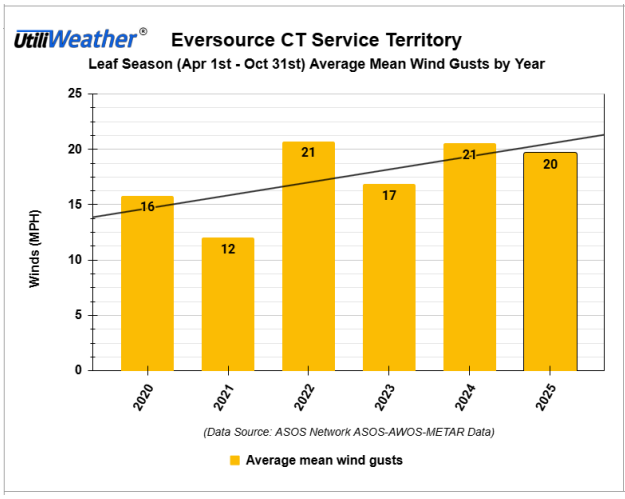
Recent meteorological data reviewed by the Company provides additional context for these observed operational trends. UtiliWeather analyzed four wind-profile parameters over a recent five-year period: average mean sustained winds, average maximum sustained winds, average mean wind gusts, and average maximum wind gusts. UtiliWeather found increasing linear trends across these wind parameters, with sustained winds exhibiting a modest increase and wind gusts exhibiting a somewhat more robust increase over the period analyzed. While the five-year period is not, standing alone, sufficient to establish a long-term climatological trend, these observations

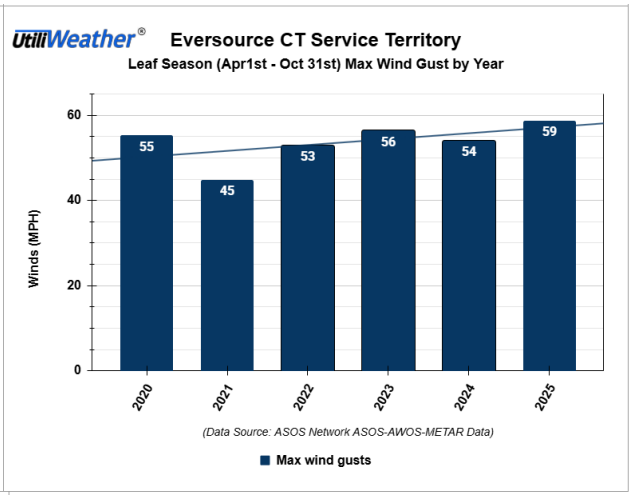
provide additional recent meteorological context that is consistent with the Company's operating experience and the longer-term regional climate information discussed above.



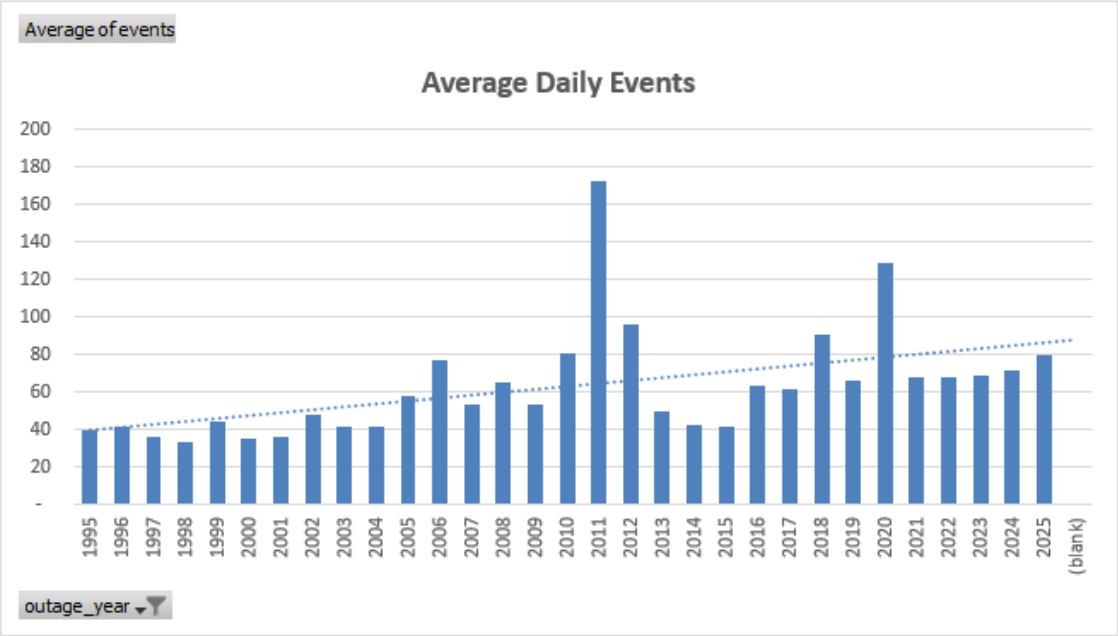


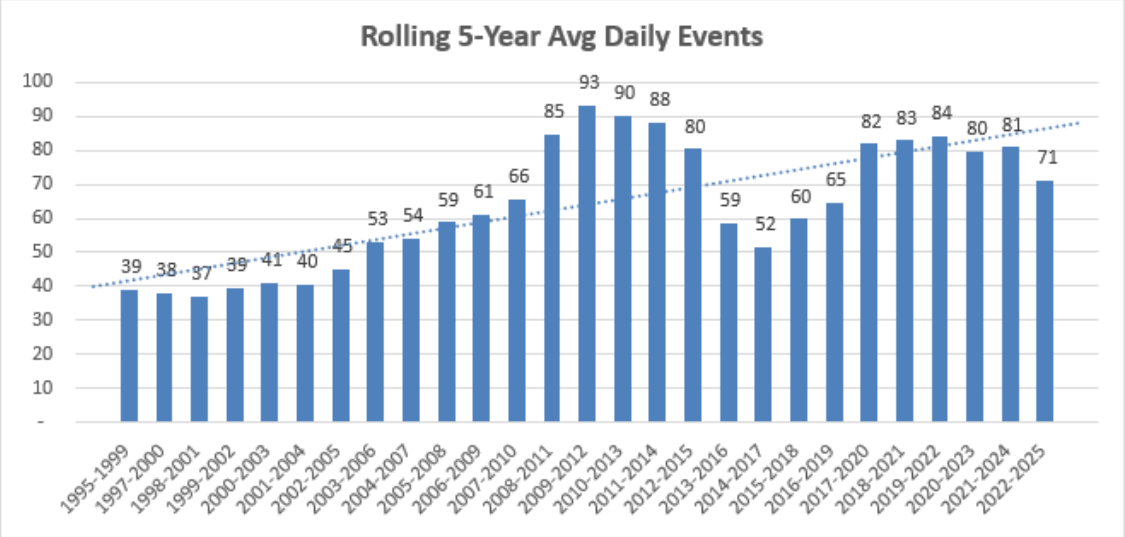






A look at the average amount of daily outage events also indicates a clear increase that the system is seeing increased outage activity on a daily basis.





At the same time, this operating trend, standing alone, does not necessarily prove that weather systems have become stronger or that climate change is responsible for any particular outage. Electric-system impacts are affected by multiple variables, including weather, vegetation, antecedent environmental conditions, infrastructure exposure and system configuration. Accordingly, the Company's operating data are appropriately considered together with, rather than as a substitute for, independent meteorological and environmental information.

Relationship to System Resilience
An increase in operationally significant weather impacts should also not be interpreted, by itself, as evidence of declining system resilience. Reliability and resilience investments can reduce the consequences of weather events, but they do not eliminate the underlying exposure of an overhead distribution system to weather and vegetation. In fact, system-impact data reflect the combined effect of the hazard to which the system is exposed and the system's ability to withstand and recover from that hazard.

For that reason, it is important to evaluate the trend in system impacts together with independent evidence regarding changes in the external environment rather than attempting to infer either weather severity or system resilience solely from outage counts.

This is also consistent with the broader treatment of infrastructure risk in the Fifth National Climate Assessment, which recognizes that additional climate-related loads and stressors can interact with infrastructure and its operational constraints to produce cascading impacts.

Conclusion
Weather, vegetation, antecedent environmental conditions and electric-system impacts are interrelated and changes in outage activity cannot reasonably be attributed to any single variable.

However, in addition to the Company's actual operational experience, multiple independent lines of evidence point in the same general direction. Scientific assessments document changes in Connecticut and the Northeast's climate, including increases in heavy precipitation and other extreme-weather characteristics relevant to electric infrastructure. Connecticut-specific observations demonstrate changing precipitation patterns, while broader assessments identify increasing risks to infrastructure from extreme weather. Those weather conditions interact with Connecticut's vegetation and antecedent environmental conditions, meaning that similar meteorological events do not necessarily produce similar electric-system impacts.

Added to this context, the Company's own operating experience demonstrates an increasing frequency of days on which weather-related impacts are significant enough to exceed approximately 100 outage events and require the Company to begin adjusting its normal operating posture.

Recent meteorological data reviewed by the Company also identifies increasing trends in sustained winds and wind gusts over the five-year period analyzed, with the increase in wind gusts being somewhat more pronounced

Viewed collectively, this data provides a more complete picture than any individual measure could provide: the weather and environmental conditions affecting Connecticut are changing; those

conditions can increase the stresses placed on an overhead electric distribution system; and the Company is experiencing an increasing frequency of operationally significant weather-related system impacts.

Accordingly, the Company's statement is made on the basis of the increasing frequency and operational severity of weather-related impacts experienced by the Company's electric system, considered in the context of independent scientific evidence documenting changes in the weather and environmental conditions affecting Connecticut.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 8. What does the Company consider a strong weather system is?

Response:

Please refer to the Company's response to OCC-247[i] for background. The Company does not use a single meteorological threshold or formal definition to classify a weather system as a "strong weather system." Rather, the term is used generally to describe weather conditions that have the potential to produce, or do produce, impacts beyond those typically managed through the Company's normal operating posture.

The potential impact of a weather system on the electric distribution system is dependent upon multiple, interrelated factors. These may include wind speed and duration, precipitation intensity and duration, lightning, snow or ice loading, flooding, soil saturation and other antecedent conditions, as well as vegetation and tree health and the geographic area affected. As a result, a weather system with a particular peak wind speed or precipitation total may produce substantially different electric-system impacts depending upon the combination of these conditions, for which no metrological agency has the ability to predicate exactly with any type of certainty.

For this reason, the Company evaluates weather systems based upon the totality of forecast and observed conditions and their actual or potential operational impacts, rather than relying upon a single meteorological measurement.

From an operational perspective, one indicator of a weather system producing a significant impact is the point at which outage activity requires the Company to begin augmenting its normal operating and restoration resources. Historically, approximately 100 outage events represents a useful reference point at which the Company may begin to supplement resources normally available for outage response, including the potential reassignment of line resources from capital, maintenance, or other planned work to restoration activities.

The Company emphasizes that approximately 100 outage events is not a definition of a "strong" weather system or a fixed threshold for storm classification. The appropriate operational response is dynamic and depends upon the nature, geographic distribution, complexity and expected duration of the event, available resources, forecast conditions, and other factors. A weather system

may therefore warrant enhanced preparation or response before reaching that level, while other conditions may be managed differently based upon the circumstances.

Accordingly, when the Company refers to a "strong weather system," it is referring generally to a weather system or combination of weather conditions capable of producing material impacts to the electric distribution system and requiring an operational response beyond, or an augmentation of, normal operating conditions, rather than to a specific meteorological classification.

Prior Referenced Response:

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[i] OCC-247 Question:
(VMP) Referring to Exhibit CLP-VMP-1, page 8. Provide support for the claim the Company has experienced increased severity and frequency of strong weather systems as compared to the storm impact over the last 26 years.

OCC-247 Response:
This statement reflects the Company's observation that weather conditions affecting its electric distribution system have become increasingly challenging over time. This observation is supported by multiple, complementary sources of information, including independent climate research specific to Connecticut and the Northeast, documented changes in Connecticut's vegetation and forest environment and the Company's own operating experience.

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Several of these forest-health threats emerged or expanded substantially during the period examined by the Company. Emerald ash borer was first detected in Connecticut in 2012 and subsequently spread throughout the State. In CAES's 2024 sampling, 314 of 387 ash trees were dead, and at sampled locations where emerald ash borer was first detected in 2012 or 2013, CAES found no living overstory or midstory ash trees. Beech leaf disease, first detected in Connecticut in 2019, subsequently spread throughout the State and has resulted in substantial deterioration in the condition and growth of affected beech trees.

These forest-health conditions demonstrate that the environment affected by weather systems has also changed. This distinction is important when evaluating impacts to an overhead electric distribution system. Heavy or prolonged precipitation can contribute to soil saturation; wind acting upon trees rooted in saturated soils may produce different consequences than similar winds under dry conditions; and dead, diseased or otherwise stressed trees may respond differently to those same weather conditions than healthy trees.

Accordingly, the ultimate impact of a weather system cannot necessarily be determined from a single meteorological variable, such as peak wind speed. Weather severity, antecedent conditions, vegetation health and electric-system exposure interact to determine the ultimate system impact.

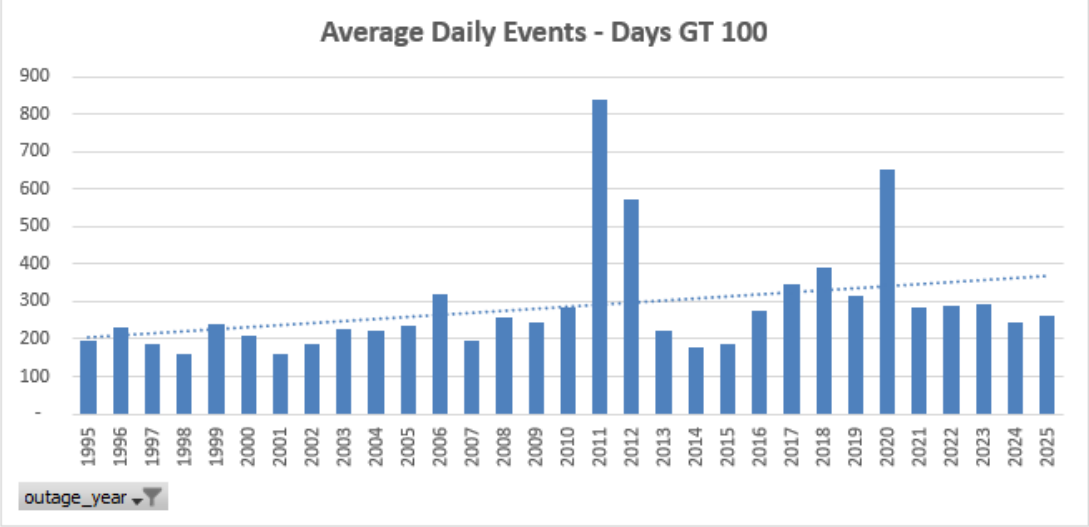
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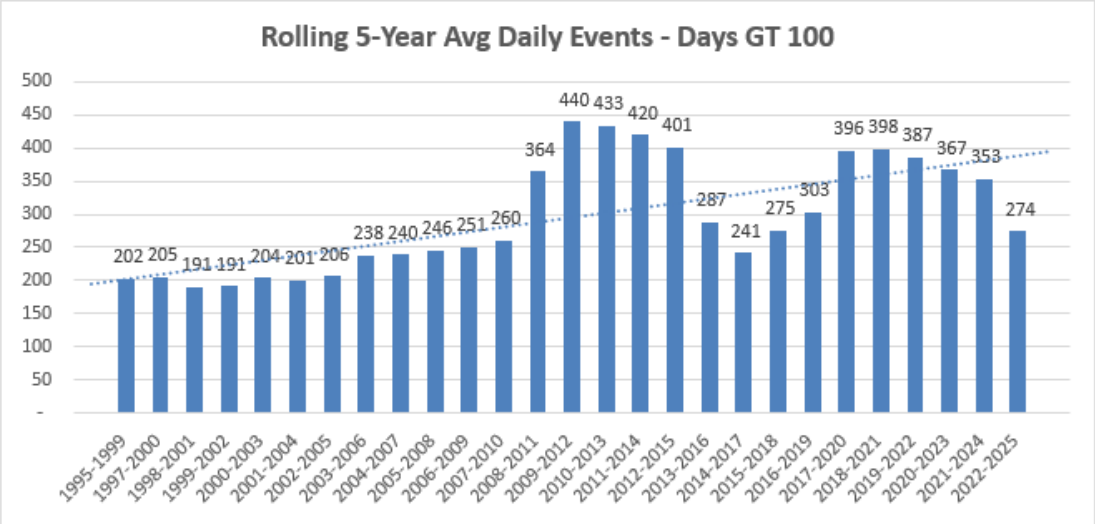
For purposes of this analysis, the Company has reviewed the frequency of days experiencing more than approximately 100 outage events. The Company does not use 100 outage events as a meteorological definition of a "strong storm," nor does reaching that level necessarily constitute activation of the Company's Emergency Response Plan. This level of outage events is simply a level of outages that would not be expected on a blue sky day and that would generally need to be provoked by an external weather impact, or other force. That is, approximately 100 outage events represents an operationally meaningful reference point because, at approximately that level of system impact, the Company's normal operating and staffing structure generally begins to require adjustment.

Under normal conditions, resources such as Response Specialist Organization personnel and lineworkers are allocated among outage response, corrective maintenance, capital work, and other normal operations. As outage-event volume increases, additional personnel may need to be redirected from their normal assignments to restoration activities, staffing structures may need to be supplemented, and additional coordination and operational support may become necessary.

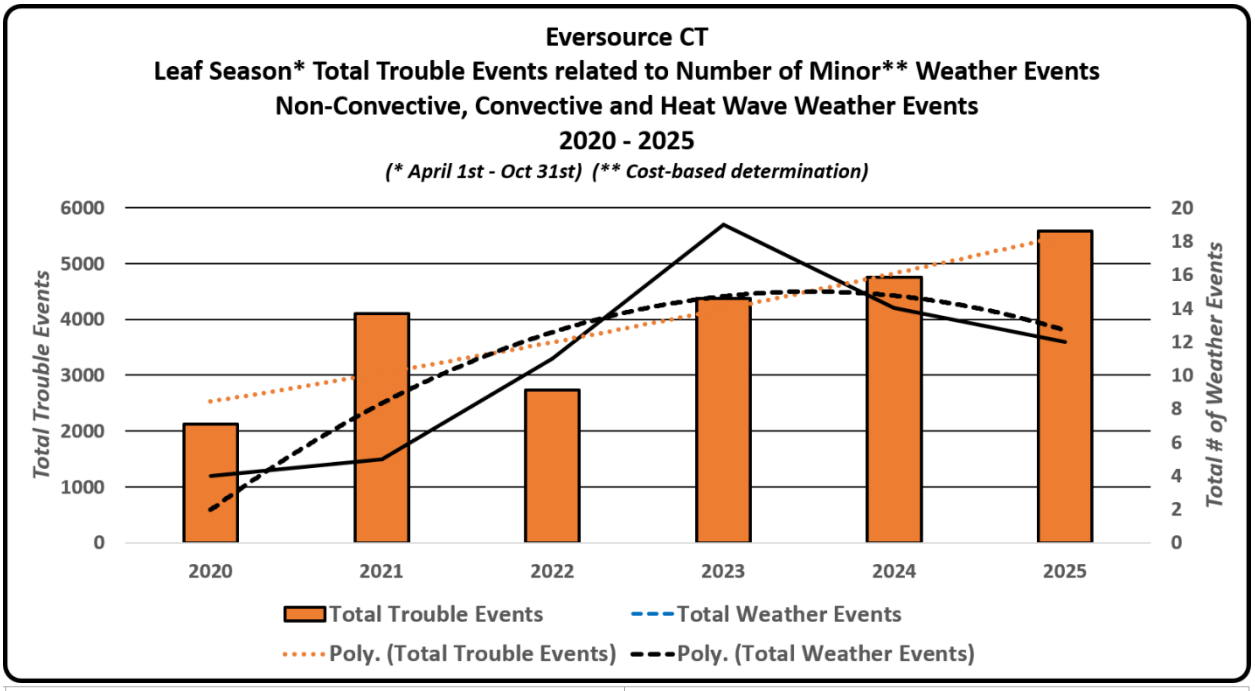
The precise point at which these actions occur is dynamic and depends upon factors including the geographic distribution and complexity of outages, expected weather duration, damage conditions, available resources, and forecast conditions. Nevertheless, approximately 100 outage events provides a reasonable and consistent reference point for examining the frequency with which weather affects the system sufficiently to cause the Company to move beyond its ordinary operating posture.

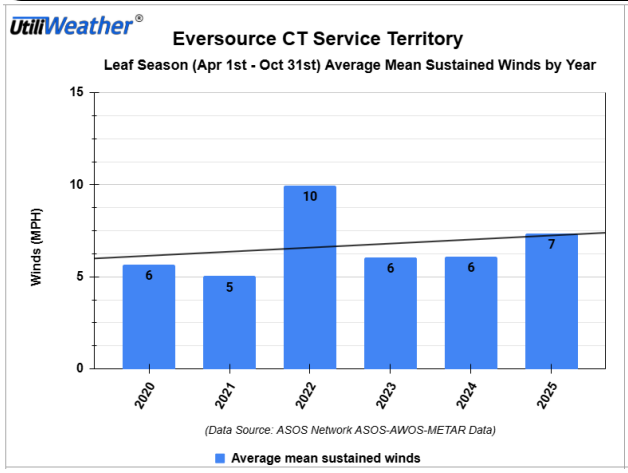
The Company's review of its historical operating data shows an increasing trend in the number of days on which the electric system experiences more than 100 outage events, including a clear upward trend. Additionally, a comparison of the rolling five-year average of days with greater than 100 outage events also shows a clear upward trend. This information is relevant because it measures the consequence of weather from an electric-system operations perspective rather than attempting to characterize storm strength through a single meteorological variable.

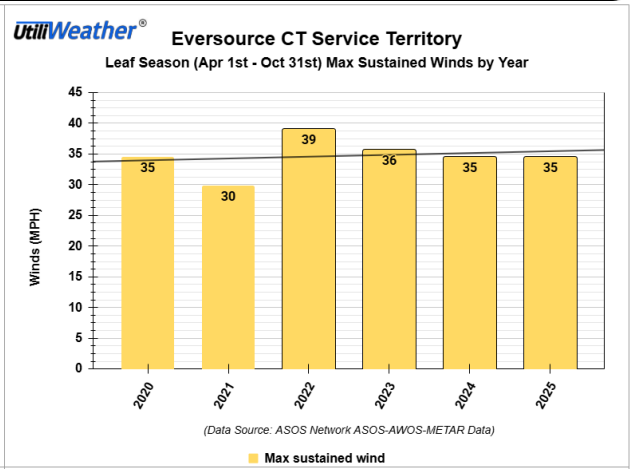


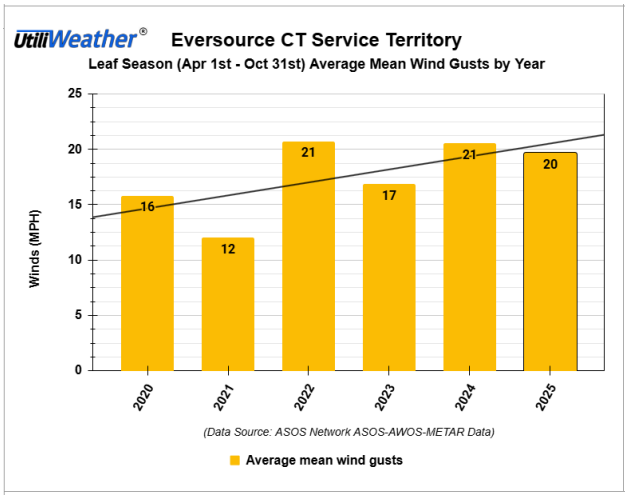


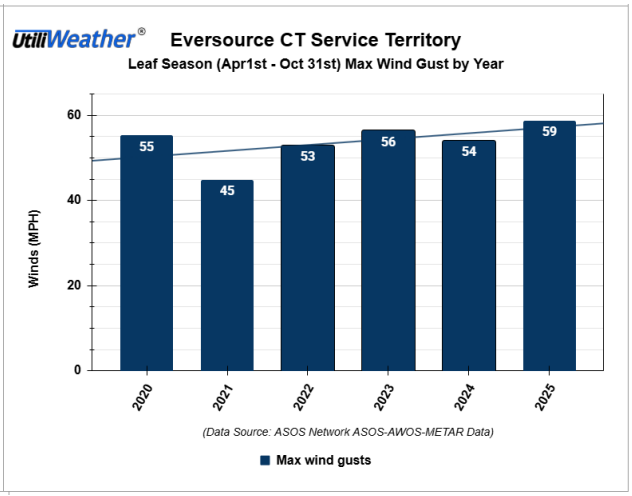
Recent meteorological data reviewed by the Company provides additional context for these observed operational trends. UtiliWeather analyzed four wind-profile parameters over a recent five-year period: average mean sustained winds, average maximum sustained winds, average mean wind gusts, and average maximum wind gusts. UtiliWeather found increasing linear trends across these wind parameters, with sustained winds exhibiting a modest increase and wind gusts exhibiting a somewhat more robust increase over the period analyzed. While the five-year period is not, standing alone, sufficient to establish a long-term climatological trend, these observations provide additional recent meteorological context that is consistent with the Company's operating experience and the longer-term regional climate information discussed above.


Eversource CT
Leaf Season* Total Trouble Events related to Number of Minor** Weather Events
Non-Convective, Convective and Heat Wave Weather Events
2020 - 2025
(* April 1st - Oct 31st) (** Cost-based determination)
Total Trouble Events
Total # of Weather Events
6000
5000
4000
3000
2000
1000
0
20
18
16
14
12
10
8
6
4
2
0
2020
2021
2022
2023
2024
2025
Total Trouble Events
Total Weather Events
Poly. (Total Trouble Events)
Poly. (Total Weather Events)

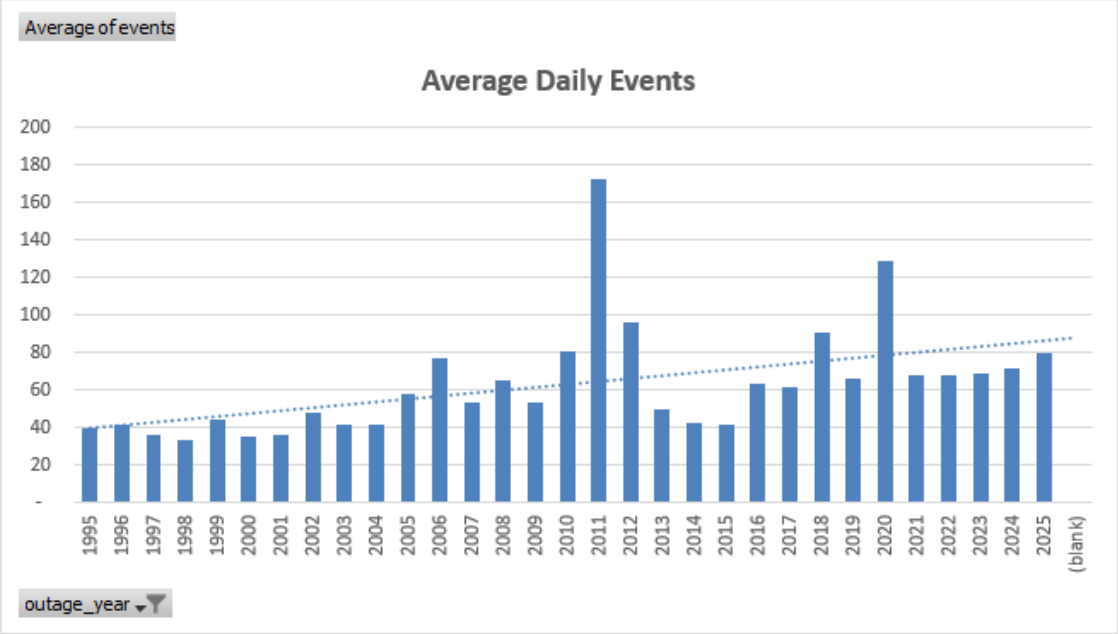

UtiliWeather
Eversource CT Service Territory
Leaf Season (Apr 1st - Oct 31st) Average Mean Sustained Winds by Year
Winds (MPH)
15
10
5
0
6
5
10
6
6
7
2020
2021
2022
2023
2024
2025
(Data Source: ASOS Network ASOS-AWOS-METAR Data)
Average mean sustained winds

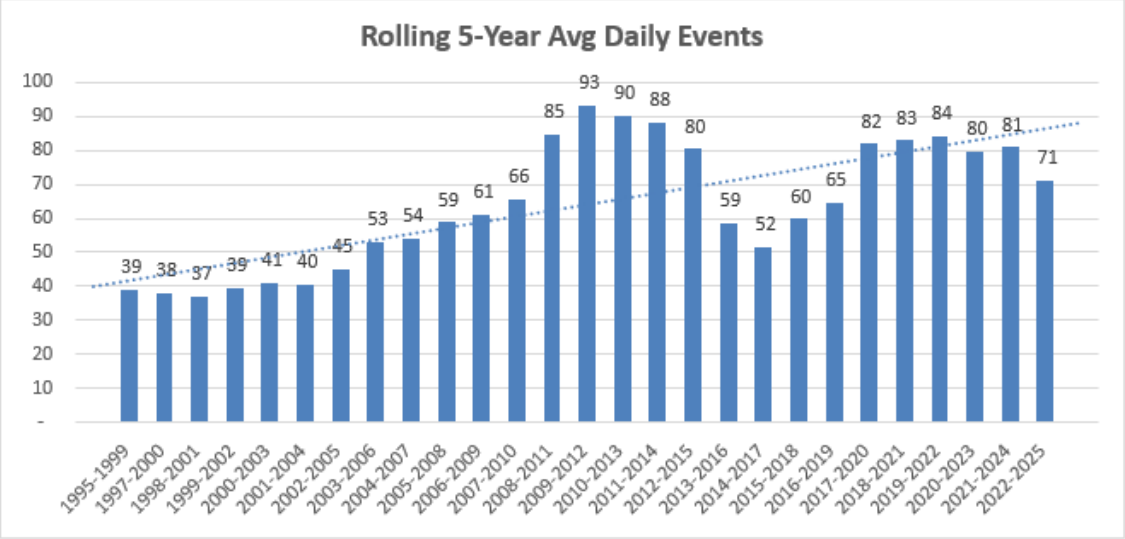

UtiliWeather
Eversource CT Service Territory
Leaf Season (Apr 1st - Oct 31st) Max Sustained Winds by Year
Winds (MPH)
45
40
35
30
25
20
15
10
5
0
35
30
39
36
35
35
2020
2021
2022
2023
2024
2025
(Data Source: ASOS Network ASOS-AWOS-METAR Data)
Max sustained wind





A look at the average amount of daily outage events also indicates a clear increase that the system is seeing increased outage activity on a daily basis.





At the same time, this operating trend, standing alone, does not necessarily prove that weather systems have become stronger or that climate change is responsible for any particular outage. Electric-system impacts are affected by multiple variables, including weather, vegetation, antecedent environmental conditions, infrastructure exposure and system configuration. Accordingly, the Company's operating data are appropriately considered together with, rather than as a substitute for, independent meteorological and environmental information.

Relationship to System Resilience

An increase in operationally significant weather impacts should also not be interpreted, by itself, as evidence of declining system resilience. Reliability and resilience investments can reduce the consequences of weather events, but they do not eliminate the underlying exposure of an overhead distribution system to weather and vegetation. In fact, system-impact data reflect the combined effect of the hazard to which the system is exposed and the system's ability to withstand and recover from that hazard.

For that reason, it is important to evaluate the trend in system impacts together with independent evidence regarding changes in the external environment rather than attempting to infer either weather severity or system resilience solely from outage counts.

This is also consistent with the broader treatment of infrastructure risk in the Fifth National Climate Assessment, which recognizes that additional climate-related loads and stressors can interact with infrastructure and its operational constraints to produce cascading impacts.

Conclusion
Weather, vegetation, antecedent environmental conditions and electric-system impacts are interrelated and changes in outage activity cannot reasonably be attributed to any single variable.

However, in addition to the Company's actual operational experience, multiple independent lines of evidence point in the same general direction. Scientific assessments document changes in Connecticut and the Northeast's climate, including increases in heavy precipitation and other extreme-weather characteristics relevant to electric infrastructure. Connecticut-specific observations demonstrate changing precipitation patterns, while broader assessments identify increasing risks to infrastructure from extreme weather. Those weather conditions interact with Connecticut's vegetation and antecedent environmental conditions, meaning that similar meteorological events do not necessarily produce similar electric-system impacts.

Added to this context, the Company's own operating experience demonstrates an increasing frequency of days on which weather-related impacts are significant enough to exceed approximately 100 outage events and require the Company to begin adjusting its normal operating posture.

Recent meteorological data reviewed by the Company also identifies increasing trends in sustained winds and wind gusts over the five-year period analyzed, with the increase in wind gusts being somewhat more pronounced

Viewed collectively, this data provides a more complete picture than any individual measure could provide: the weather and environmental conditions affecting Connecticut are changing; those conditions can increase the stresses placed on an overhead electric distribution system; and the Company is experiencing an increasing frequency of operationally significant weather-related system impacts.

Accordingly, the Company's statement is made on the basis of the increasing frequency and operational severity of weather-related impacts experienced by the Company's electric system, considered in the context of independent scientific evidence documenting changes in the weather and environmental conditions affecting Connecticut.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 9. How does the Company measure wind "turbulence" and "torque" impact on trees?

Response:

The Company does not specifically measure wind "turbulence" or "torque" impact on trees. Wind turbulence creates rapidly changing forces on a tree, causing it to bend, sway, and respond to wind from multiple directions rather than from a single direction. Torsion, or twisting forces, occur when wind loads are unevenly distributed across the tree, creating twisting stress in the branches, branch unions, and the trunk. These dynamic bending and torsional forces may increase existing defects such as cracks, branch unions, or root defects. Tree failure is commonly the result of several forces acting on the tree or tree part at once including wind speed, wind turbulence, bending forces, and torque which combined with any tree defects influence the likelihood of failure.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 9. Provide an Excel spreadsheet with an entire list of storms from 2021 through 2025 with each storm's maximum and average wind turbulence by area work center location.

Response:

The Company has not installed weather stations at Area Work Center ("AWC") locations and Connecticut weather stations typically do not utilize sensors capable of high-frequency sampling required to capture rapid fluctuations in wind speed and direction needed to directly monitor wind turbulence.

Wind profile data is available for each of the six sub-regions of Connecticut: Western, Western Coastal, Central, Central Coastal, Eastern, and Eastern Coastal. The wind profile parameters for each event include mean sustained winds, max sustained winds, mean wind gusts, and max wind gusts; however, the program to extract this data and present the trends over the 2021-2025 timeframe is under development.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 9. Do the Company's internal employees measure wind turbulence or torque impact on trees?

Response:

No, the Company's internal employees do not measure wind turbulence or torque impact on trees. Rather, this is a matter of observation and impact. Please see the Company's response to OCC-249[i] for a description of the impacts turbulence and/or torque have on trees and outages.

Prior Referenced Response:

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[i] OCC-249 Question:
(VMP) Referring to Exhibit CLP-VMP-1, page 9. How does the Company measure wind "turbulence" and "torque" impact on trees?

OCC-249 Response:
The Company does not specifically measure wind "turbulence" or "torque" impact on trees. Wind turbulence creates rapidly changing forces on a tree, causing it to bend, sway, and respond to wind from multiple directions rather than from a single direction. Torsion, or twisting forces, occur when wind loads are unevenly distributed across the tree, creating twisting stress in the branches, branch unions, and the trunk. These dynamic bending and torsional forces may increase existing defects such as cracks, branch unions, or root defects. Tree failure is commonly the result of several forces acting on the tree or tree part at once including wind speed, wind turbulence, bending forces, and torque which combined with any tree defects influence the likelihood of failure.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP) Referring to Exhibit CLP-VMP-1, page 9. Does the Company utilize external contractors to measure wind turbulence or torque impact on trees?

Response:

No, the Company does not utilize external contractors to directly measure wind turbulence or torque impact on trees.

Date Filed: August 21, 2026

Witness: John P. DiPaola-Tromba, Sean D. Redding and Jenna Turner
Request from: Office of Consumer Counsel

Question:

(VMP-Branches) Referring to Exhibit CLP-VMP-1, page 7 and 9. Based on the Company's statement that hazard trees cause 76% of customer outages:

a. Please provide all research and/or justification for focusing on trimming branches that are encroaching into conductors and removing overhanging branches.
b. Would a greater focus on hazard trees instead of trimming branches produce better grid reliability? Please provide all research the Company has conducted on this subject.

Response:

The Company does not state that hazard trees cause 76% of customer outages. Rather, the Company's statement is that hazard trees are responsible for 76% of tree-failure related customer outages.

Please refer to exhibit CLP-VMP-1, at page 7 at lines 11-15: *Hazard trees are a major focus of the VMP because hazard trees constitute only a small percent of the overall Connecticut tree population but are responsible for approximately 76% of tree failure-related customer outages experienced across the operating year.*

Please refer to the response to OCC-244[i] and CLP-VMP-2, at page 7. Tree-failure related interruptions are approximately **56%** (686/1,229 outages investigations) of the tree-related customer outages on blue sky or non-storm days. The remaining **44%** of tree-related outages are comprised of:

- Inside Zone Limb Grow-in (5%)
- Inside Zone Broken Limb Fall-in (1%)
- Inside Zone Overhang Limb Fall-in (10%)
- Outside Zone Broken Limb Fall-in (14%)
- Outside Zoen Overhang Limb Fall-in (14%)

Please refer to CLP-VMP-2, at pages 18-20 for the justification of how each proposed program (e.g. Scheduled Maintenance Trimming, Reliability Tree Work, and Reliability Tree Removals) may prevent tree-related outages and the associated percentage of tree-related outages that may be attributed to each program.

A greater focus on hazard and risk trees instead of trimming would not produce better reliability. The relatively low proportion of Inside Zone Limb Grow-in outages (5%) is due to the Company maintaining the approximately 16,000-mile roadside distribution system through tree trimming programs on a targeted four-year cycle. Please refer to CLP-VMP-2 at page 14. The terrestrial LiDAR pilot results highlight Connecticut's roadside forest exposure and demonstrate that by year three of the cycle, post-maintenance, 74.92% of the segments had vegetation encroachment within the trim zone and 70.55% of the segments had vegetation overhang. The company cannot solely focus on hazard and risk tree removals because over time a reduction in trimming would result in more outages as vegetation grows into contact with the distribution system and would become more expensive to remediate on a reactive "trim as needed" basis. Rather, the Company needs to trim every mile on the four-year cycle with a reinstituted mid-cycle program to proactively maintain the safety and reliability of the distribution system.

Prior Referenced Response:

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[i] OCC-244 Question:
(VMP) Referring to Exhibit CLP-VMP-1, page 7. Provide support for the claim hazard trees are responsible for approximately 76% of tree failure-related customer outages experienced across the operating year.

OCC-244 Response:
From January 6, 2023 through April 20, 2026, the Company's Connecticut licensed and trained Arborists performed 1,229 outage investigations pertaining to customer interruptions on blue sky or non-storm days. Of the 1,229 outage investigations, 686 were caused by whole-tree failure and, of that number, a total of 522 (76%) of these instances were determined to be caused by hazard trees.