Date Filed: November 02, 2026

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

Question:

(Follow-up to ALLCO-123 — the § 16-243p(b) advice.) The response states that the legal advice on which ALLCO-034(d) relies "was given during the process of responding to this request" and that "[n]o separate legal document was prepared." State: (a) the firm and title of the attorney who gave the advice, the date, and the Company personnel to whom it was given; (b) whether the Company intends to rely on that advice, in whole or in part, to support recovery of confidentiality-designation and redaction costs, and if so whether it will produce it; (c) in the Company's own words and without reference to counsel — the question ALLCO-123(d) asked and the response did not address — each reason the Company contends that redaction and confidentiality-designation work performed for filings and discovery responses in this proceeding is not a "direct or indirect cost[] associated with its … participation in" the proceeding under § 16-243p(b); whether fees paid or payable to Keegan Werlin LLP or TCDI for that work are "attorneys' fees" or "fees to engage … consultants"; and whether the time of internal counsel and project-management staff devoted to it is "the portion of employee salaries associated with such … participation"; (d) the amount of redaction and confidentiality-designation cost included in the Test Year, Test Year Pro Forma, or Rate Year cost of service or in any deferral, with the schedule and line; and (e) each other category of cost of this proceeding the Company contends is recoverable because it is "incurred to comply with legal obligations," with the amount and schedule reference (ALLCO-123(e), unanswered).

Response:
The Company's response to ALLCO-123[i] provided sufficient information to be responsive to Allco's inquiry.

Prior Referenced Response:

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[i] ALLCO-123 Question

(ALLCO-034(d) — the legal advice on § 16-243p(b).) The Company's response to ALLCO-034(d) states that it "has been advised by legal counsel that the confidentiality-designation and redaction work does not fall within any of the enumerated classes or categories of costs that are ineligible for recovery through rates under Conn. Gen. Stat. § 16-243p(b)" because the work is "incurred to comply with legal obligations governing disclosure of public records and confidential information." (a) Identify the counsel (firm and individual) who gave that advice, the date(s) on which it was given, and whether it was given orally or in writing. Produce each opinion, memorandum, letter, e-mail, or other document containing or reflecting the advice. (c) If the Company withholds any such document on a claim of privilege, identify for each its date, author, recipients, subject matter, and the privilege claimed, and state whether the Company

intends to rely on the advice of counsel, in whole or in part, to support recovery of any cost in this proceeding. (d) State, in the Company's own words and with reference to the text of § 16-243p(b), each reason the Company contends that confidentiality-designation and redaction work performed for filings and discovery responses in this proceeding is not a "direct or indirect cost[] associated with its … participation in" this rate proceeding; whether fees paid or payable to Keegan Werlin LLP for that work are "attorneys' fees" within the statute; and whether the time of the Company's internal legal counsel and project-management staff devoted to that work is "the portion of employee salaries associated with such participation." (e) Identify every other category of cost of this proceeding that the Company contends is recoverable on the rationale that it is "incurred to comply with legal obligations," stating for each the amount and the revenue-requirement schedule and line in which it appears.

ALLCO-123 Response

CL&P objects to this request on the ground that it seeks information protected by the attorney-client and attorney work product privileges.

CL&P further objects to this request on the ground that it calls for a legal conclusion.

Without waiving said objections, the legal advice in the Company's response to ALLCO-034i subpart (d) was given during the process of responding to this request. No separate legal document was prepared for the purpose of responding to this subpart.