STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	**SEPTEMBER 8, 2026**

THE OFFICE OF CONSUMER COUNSEL'S FOURTEENTH SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from the Connecticut Light and Power Company d/b/a Eversource Energy to the following interrogatories in the above-captioned proceeding by **September 22, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

B. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

C. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

D. Provide English translations of all responsive documents that exist in a language other than English.

E. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or

control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-559 through OCC-589 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

Exhibit CLP-PBR-1 – Performance Based Ratemaking

OCC-559. (Customer dividend) In Exhibit CLP-PBR-1, LEI states that approved Consumer Dividends or stretch factors in other North American jurisdictions generally range from 0.15% to 0.60%, as reflected in Figure 12 of Exhibit CLP-PBR-3:

a. Please provide a list of each utility and jurisdiction included in deriving this range, including the applicable PBR plan or regulatory proceeding, the approved Consumer Dividend/stretch factor, and the year(s) in which it applied.

b. Please explain the criteria used to select the utilities and PBR plans included in this comparison, including whether the comparison includes all relevant North American PBR plans reviewed by LEI or a subset.

c. Please explain how the 0.15%–0.60% range, and CL&P's position within that range, informed the selection of the proposed 0.30% Consumer Dividend, including any quantitative or qualitative analysis used to determine that 0.30% was appropriate for CL&P.

OCC-560. (Total factor productivity) In Exhibit CLP-PBR-1, Page 32, LEI states that "*On the other hand, a longer term (e.g., more than 20 years) would also not capture significant changes in the industry such as widespread AMI deployment, distributed energy resources ("DERs"), increased cybersecurity requirements, resilience and climate adaptation investments, and modern vegetation management practices.* ".

a. Please identify each formal statistical test for structural breaks or parameter instability performed by LEI across the 2005–2024 study period to evaluate the timing and statistical significance of the alleged structural breaks. If no such tests were conducted, please explain the empirical basis for LEI's assertion.

b. Please provide any empirical or quantitative analysis performed by LEI or the Company evaluating the specific impact of AMI deployment, automation, and DER integration on OM&A efficiency and labor productivity.

c. Given that large-scale AMI deployment, advanced DER integration, and heightened cybersecurity requirements emerged primarily within the last 5 to 10 years, please explain why a 20-year historical average (2005–2024)—which incorporates a decade of pre-AMI/pre-DER data—is more representative of forward-looking operating conditions than a 5- or 10-year period.

OCC-561. (Total factor productivity) Refer to Exhibit CLP-PBR-1, pp. 43-44. Testimony suggests that the LEI's industry TFP study is aligned with TFPs for the EDC sector in New Hampshire, Alberta, and Massachusetts. Explain whether each of the x-factors provided for these three examples were calculated for O&M only or both O&M and capex.

OCC-562. (Performance incentive mechanisms) Refer to Exhibit CLP-PBR-1, p. 66. As stated, the Company's PIM proposal for exposure to financial penalties is limited to an amount equal to 0.5% of the Company's total distribution revenues. How was this limit determined to be the maximum reasonable threshold for penalty exposure?

OCC-563. Please provide, for each EDC and each year included in LEI's Industry TFP Study and Benchmarking Study, all data and calculations used to determine the portion of A&G expense attributed to electric distribution operations, including:

a. Total reported A&G expense;

b. Total plant in service;

c. Electric distribution plant in service;

d. The resulting distribution plant share used to allocate A&G expense; and

e. The resulting amount of A&G expense included in OM&A for purposes of the TFP and benchmarking analyses.

f. Please provide the underlying data, sources, and calculations in an unlocked Excel workbook with formulas intact.

Exhibit CLP-ELP-1 – Capital Support Mechanism

OCC-564. (Capital support mechanism) Refer to Exhibit CLP-ELP-1, p.101. "As part of the Company's annual RAM compliance filing, actual plant additions placed in service during the applicable plan year will be reconciled against the approved forecast." Provide a list of all instances known to the Company in which approved multiyear rate plans for utilities in other jurisdictions employ downward reconciliation of capital. In each instance, please provide the state, the utility, the applicable rate years for the approved multiyear rate plan. For each rate year, indicate whether utility costs were lower than what was approved, and how much was reconciled and returned to ratepayers (in dollars).

Exhibit CLP-ELP-2 – Empirical Analysis Of Total Factor Productivity Trends In The U.S. Electric Distribution Industry

OCC-565. (Total factor productivity) Refer to Exhibit CLP-ELP-2, Page 35, Foot note 52, LEI states that "*LEI also evaluated the Handy-Whitman Index (" HWI") of public utility construction costs as a potential capital price deflator. LEI ultimately selected the BLS Producer Price Index for two primary reasons. First, unlike the PPI, the HWI is proprietary, and its w1derlying methodology and data are not publicly disclosed, making it difficult to independently evaluate or replicate the resulting estimates. Second, sensitivity testing demonstrated that use of the HWI generated implausibly large real retirement values for certain utilities, resulting in negative estimates of real capital stock under the perpetual inventory method. These outcomes are not economically plausible ai1d would have necessitated the exclusion of affected utilities from the sample. The issue became more pronounced under assumptions of longer asset service lives (i.e., 40, 45, and 50 years).* " Please explain the Company's use of the Handy-Whitman Index ("HWI") in Exhibit CLP-IAP-7 with LEI's decision not to use HWI as a capital price deflator in Exhibit CLP-PBR-2. Specifically:

a. Please explain why the Company considers HWI to more accurately reflect how inflation impacts Distribution Companies within the region and to be the appropriate inflation factor for the Exhibit CLP-IAP-7 - RE08 affordability test, while LEI determined that HWI presented methodological and data limitations, including lack of transparency and replicability and, in certain applications, economically implausible estimates of real capital stock.

b. Please recalculate Tables 3 and 4 of Exhibit CLP-IAP-7 using a consistent inflation measure for both historical and forecast spending, including, at minimum, HWI and the BLS PPI used by LEI in Exhibit CLP-PBR-2, and provide the resulting affordability threshold and percentage of the threshold represented by the proposed LRP.

Exhibit CLP-TSP-1 – Joint Testimony of Lavelle A. Freeman, David L. Gladey, Jennifer A. Schilling, Dr. Elli Ntakou and John DiPaola-Tromba

OCC-566. In Exhibit CLP-TSP-1, Page 13, Eversource notes the following: *"The purpose of our joint testimony is to present CL&P's 5-Year Targeted System Performance Plan (the "TSP Plan" or the "Plan"), covering the planning horizon for operations and investment on the Company's distribution system over the timeframe of January 1, 2027 through December 31, 2031. A summary narrative of CL&P's State of the System report providing a foundational perspective on the 5-Year Plan is provided herewith as Exhibit CLP-TSP-2. In addition, a detailed presentation of the 5-Year TSP framework is presented as Exhibit CLP-TSP-3."*

The proposed decision issued on July 17, 2026 in docket 21-05-15RE03 lists the following content items for inclusion in an IDSP document:[1]

a. Executive Summary - identifies key points from each section of the document;
b. Planning Policy – discusses relevant state and local goals and policies that inform grid planning;
c. Current State of the System – provides an overview of existing grid conditions including but not limited to capacity, reliability, and DER integration issues;
d. IDSP Methodology – explains the planning methods used to produce the IDSP;
e. Stakeholder Engagement and Social Equity – specifies how stakeholders participate in the IDSP process, as well as social and environmental equity considerations;
f. Load Forecasting – consists of all components of peak load;
g. Grid Needs Assessment – consists of various capacity, reliability, and resiliency analyses substantiating investment needs;
h. Solution Selection Process – provides the criteria and methods used to identify, assess, compare. and select both traditional and non-traditional grid capital investments for implementation;
i. Capital Investment Plan – lists, prioritizes, and describes all planned
j. investments for a ten-year planning horizon; and
k. Long-Term Strategic Plan – provides an overview of strategic plans for the grid beyond a ten-year planning horizon.

For each of the content items above, please share what aspects of the submitted TSP Plan represent information that would be included in each of the proposed IDSP sections.

Please include exhibit and slide or page numbers for any content that would belong in each of the content sections.

Exhibit CLP-TSP-2 – Summary Narrative on the State of the System

OCC-567. In Exhibit CLP-TSP-2, Page 24, Eversource notes that *"Collectively, historical system analysis, economic forecasting, distributed energy resource modeling, electric vehicle forecasting, energy efficiency projections, and large customer analyses are integrated into the Company's substation-level forecasts and long-term demand assessments."*

Please share how the impacts from its existing demand response programs including but not limited to: Connected Solutions, Energy Storage Solutions, Electric Vehicle Managed Charging[2] are incorporated into the forecast.

Exhibit CLP-TSP-3 – Presentation of the 5-Year Targeted System Performance Plan

OCC-568. In Exhibit CLP-TSP-3, Page 42, Eversource provides a table with investment categories by year. Please clarify how the following categories are mutually exclusive:

a. Reliability
b. Capacity
c. Emergent
d. Asset Health

OCC-569. In Exhibit CLP-TSP-3, Page 48, Eversource provides a table with investment categories by year. For each line item in the table, please provide a brief description of what investments are included in the line item, as well as how the line item is mutually exclusive from the other rows in the table.

OCC-570. In Exhibit CLP-TSP-3, Pages 40, 46, and 50 Eversource lists forecasted impacts to the system by spending scenario. For each listed impact on slides 40, 46, and 50, please share how Eversource plans to measure and monitor the impact over the 5-year spending period?

Exhibit CLP-AMI-1 – Direct Testimony of Jared A. Lawrence and Douglas P. Horton

OCC-571. In Exhibit CLP-AMI-1, Page 27, Eversource *"proposes to include AMI capital costs as eligible capital costs to be recovered and reconciled in the proposed PBMRP capital funding mechanism."* However, it proposes to recover incremental O&M costs and legacy meter infrastructure costs using securitization. Please explain why AMI capital costs should not also be recovered using securitization.

Exhibit CLP-AMI-2 – AMI Deployment and Implementation Plan

OCC-572. In Exhibit CLP-AMI-2, Page 87, Eversource states that *"Recognizing that the AMI program requires sizable investments, Eversource embraces accountability for executing the program effectively and delivering the expected benefits to customers. Accordingly, Eversource proposes a performance metrics framework to provide transparency into both the success of the AMI deployment and the realization of benefits. In each category, the Company is proposing to report annually on a slate of metrics."*

a. Given Eversource's stated commitment to accountability, please explain what would happen if the company does not achieve the expected performance metrics in the proposed time horizon.

OCC-573. Refer to Exhibit CLP-TSP-2 at 24, "At the bulk substation level, the Distribution System Planning Guide (DSPG) establishes criteria and guidelines for planning and design of bulk substations and distribution facilities."

a. Please provide a copy of the Distribution System Planning Guide (DSPG).

OCC-574. Refer to Exhibit CLP-TSP-2 at 21-22, "Load Forecasting Data and Analytics."

a. Does the Company develop load forecasts at the substation, feeder or both?
b. Does the Company currently develop hourly load forecasts for its substations and feeders? If not, please describe the granularity of the Company's forecasts for substations and feeders.
c. Does the Company currently develop multiple scenarios for its load forecast? If so, please describe each of the scenarios.

OCC-575. Refer to Exhibit CLP-TSP-2 at 21-22, "Historical System Load Analysis."

a. Please describe the temporal granularity (i.e hourly etc.) of the historical loading information used to inform the Company's load forecast and whether this varies depending on location and data availability.
b. Please describe the percentage of substations and associated feeders with available 8760 hourly profiles. If some or all of the substations and associated feeders do not have 8760 hourly profiles, please describe whether and when the Company plans to have 8760 profiles available.

OCC-576. Refer to Exhibit CLP-TSP-2 at 22-23, "Distributed Energy Resource Modeling" and "Electric Vehicle Forecasting."

a. Does the Company incorporate DER and EV flexibility potential into its load forecasts?
    i. If so, please describe what resources and flexibility assumptions are incorporated into the forecasts.
    ii. If not, please describe if and when the Company intends to incorporate DER and EV flexibility potential and assumptions into their forecasts.
b. Please describe any other flexibility assumptions the Company currently incorporates or plans to incorporate into their forecasts.

OCC-577. Refer to Exhibit CLP-TSP-3 at 98, "Independent Process Monitor – Designated by PURA to review utility analyses and filings."

a. Please confirm the "utility analyses and filings" is the output of the Company implementing its internal NWA process to screen constraints for NWA viability.

OCC-578. Refer to Exhibit CLP-TSP-3 at 99-100, "Eversource Internal NWA Process".

a. Please provide any documentation or details describing the specific "Standardize screening criteria, inputs and outputs" within the Company's internal NWA process.

b. Does the Company consider distributed generation, energy storage, demand response, energy efficiency, advanced grid technologies (i.e virtual power plants) and EV integration to be "proven and tested technologies"?

OCC-579. Refer to Exhibit CLP-TSP-3 at 101-106, "Non-Wires Alternative Projects, Eversource Battery Storage NWA Projects for Substation Capacity Relief".

a. What is the status of the non-wires alternative projects for Campville 14R and Frybook 14B?

i. Have these projects been procured and are they in-service?

ii. Is the Company seeking cost recovery for implemented projects or approval for proposed projects?

b. Please describe what DER control approach (e.g DERMS) the Company has or plans to use to dispatch battery storage.

c. Are the battery storage NWAs utility or third party owned?

d. Please describe the BCA methodology including the types of benefits quantified for the cost-effectiveness supplemental analysis.

OCC-580. Refer to Exhibit CLP-TSP-3 at 11, "DER Enablement."

a. Please confirm the "150 MW from 9 station projects" whether these projects investments the Company is currently making or is requesting approval for in this rate case.

b. Please provide the following details regarding the "+110 MW from 7 additional projects."

i. Please identify the 7 projects enabling the additional +110MW of DER capacity and whether these are load driven upgrades.

OCC-581. Refer to Exhibit CLP-TSP-3 at 43, "Grid Services Compensation Fund - $38M"

a. Is the Grid Services Compensation Fund a new proposal seeking PURA approval as part of the targeted system performance plan? If not, please explain whether the Company has already made investments in this fund and whether it is seeking cost recovery in this rate case.

b. Please explain the scope of the Grid Services Compensation fund including what grid services will be procured, how grid services will be valued and compensated, what timeline grid services will be enabled and how stakeholders will be engaged to implement this proposal.

c. Please provide a breakdown of how the $38m will be allocated to implement this proposal.

OCC-582. Refer to Exhibit CLP-TSP-3 at 107-108, "Grid Modernization, Distributed Energy Resource Management System (DERMS)".

a. Please describe the DERMS capital and O&M spending spent to date and requested as part of the Targeted System Performance Plan.

b. Please confirm whether the Company is requesting funding for DERMS from the "Sustained Plan" and/or "Advancing the Grid" plan. If separate funding is requested within each plan, please provide a breakdown of the costs between the Sustained and Advancing the Grid plan.

c. Please describe the key milestones, status and estimated timelines for the Company to deploy a grid DERMS including the following:

i. Please describe the status of procuring a grid DERMS system and/or aggregator/edge DERMS.

ii. Please describe the status of completing the ADMS – DERMS Integration.

iii. Please describe the extent to which the Company has established an architecture and technical operational requirements to standardize and implement a DERMS – DER Gateway.

iv. Please describe whether the Company has developed a formal architecture for how grid DERMS will interact and integrate with an Aggregator or edge DERMS. Specifically, please indicate whether the Company intends to use a single or multiple aggregator/edge DERMS to dispatch aggregations and virtual power plants.

v. Please describe the communications architecture the Company intends to use to communicate directly with third-party DERs and aggregator/edge-DERMS including the communication network and protocol.

vi. Please describe whether the Company has a deployment plan for where and when DERMS will be deployed across its system and what use cases will be prioritized.

OCC-583. Refer to Exhibit CLP-TSP-3 at 107-108, "Enable dynamic flexible interconnections to reduce costs of DER integrations)".

a. Please describe the status of developing a dynamic flexible interconnection program including when the Company expects to conduct its first demonstrations.

b. Has the Company evaluated using dynamic flexible interconnection as a way to defer to the proposed upgrades as part of the proposed Shared Hosting for Advancement of Renewable Energy (SHARE) Program?

OCC-584. Refer to Exhibit CLP-TSP-1 at 68, "DERMS Demonstration – Demonstrate the value proposition of advanced DERMS capabilities, including (1) use of DER to increase system efficiency and reduce line losses; (2) integration of multiple types of DER in a microgrid application for critical load; and (3) investigation of lower cost approaches to

communication and control of stand-alone solar and storage facilities integrated into the Company's centralized DERMS system."

a. Has the Company deployed DERMS and implemented any DERMS use cases to date?
b. Please describe how this DERMS demonstration will be coordinated with the implementation of the Grid Services Compensation Fund and Dynamic Flexible Interconnection.

OCC-585. Refer to Exhibit CLP-TSP-3 at 134, "The DERMS demonstration location will be determined based on further study; preliminary assessment indicates the potential of coordinating with other programs planned at Triangle, Frybrook, and Campville."

a. Please describe the "other programs" planned at Triangle.
b. Please confirm the other programs planned at Frybrook, and Campville are the NWA projects. If not, please describe the other programs planned.

OCC-586. Refer to Exhibit CLP-TSP-3 at 134, "Advancing the Grid, Overview."

a. Please provide a line budget breaking down the proposed costs annually and in total across the "Advancing the Grid" program by asset health, communications, grid operations technology, planning analytics, sensors and SHARE.
b. Please also provide a line-item budget breakdown for the grid operations technology category.

OCC-587. Refer to Exhibit CLP-TSP-3 at 138, "Advancing the Grid, Planning Analytics - Advanced Forecasting Tools."

a. Please describe the milestones and timelines to integrate this tool into distribution planning if approved.
b. Please explain why existing forecasting tools cannot generate forecasted 8760 load shapes across all levels: substation, transformer, and at circuit levels

OCC-588. In Exhibit CLP-TSP-3, Page 29, Eversource shares that the *"greatest large DER potential is in rural areas where native load is light (Eastern, Northern and Northwest)."*

a. Please provide your forecasted solar capacity by region over the 10 year forecast period (2026-2035),

OCC-589. In Exhibit CLP-TSP-3, Page 87, Eversource indicates that it uses top-down forecasting for electric vehicle, solar, and energy efficiency adoption for its 10-year distribution planning horizon, and bottom-up forecasting for electric vehicle, solar, and energy efficiency adoption for its long-term demand assessment.

a. Please identify what specific legislation or state policy objectives, if any, informed your forecast for the distribution planning horizon and what specific legislation or state policy objectives, if any, informed your forecast for the long-term demand assessment.
b. Please explain your rationale for using a top-down forecast for the distribution planning assessment, and a bottom-up forecast for the long-term demand assessment.

c. Please identify what data is included in the "Socio – Economic Modelling based on Customer Reference Classes" referenced for the bottom-up forecast for the long-term demand assessment.
d. Please provide the following from your top-down forecast:
    i. Annual forecasted electric vehicle adoption from 2027-2036, by region
    ii. Forecasted impact on peak from electric vehicle adoption from 2027-2036, by region
    iii. Forecasted impact on peak from energy efficiency from 2027-2036, by region
    iv. Forecasted impact on peak from solar adoption from 2027-2037, by region

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 8th day of September, 2026.

By: /s/ Kimberly White
Kimberly White
Commissioner of the Superior Court