STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

September 29, 2026
In reply, please refer to:
Docket No. 26-05-10

Vincent Pace, Esq.
Assistant General Counsel
Eversource Energy Service Company
P.O. Box 270
Hartford, CT 06141

Re: Docket No. 26-05-10 – Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Attorney Pace:

Enclosed are interrogatories numbered **RSR-32 through RSR-45,** directed to The Connecticut Light and Power Company d/b/a Eversource Energy (Company) and refers to the Company's request to amend its rate schedules.

The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) in connection with the above-referenced docket and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **October 13, 2026, at 4:00 p.m.** The Authority encourages the submission of responses as soon as they are available rather than delaying until all answers are completed. **Please list each question and answer on the same sheet of paper using a separate sheet for each interrogatory number, and sequentially number the pages of each response (e.g., p. 1 of 5, etc.). At the top of each page, clearly identify the Docket Number, the interrogatory number (including the prefix), the name of the company and the person responsible for the response, and the date of submission.**

Similarly, each Late Filed Exhibit that may be submitted after hearing in this docket shall be sequentially numbered and identified with the Docket Number, Late Filed Exhibit Number, page number, the name of the company and the person responsible for the exhibit, and the date of submission.

If a response to any of the requested information has already been filed in response to another Parties' interrogatory(ies) in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

ELECTRONIC SUBMISSION OF FILINGS

IMPORTANT NOTE: The Authority has indefinitely suspended the paper copy filing requirement. Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to the Electronic Filing webpage for more information, including on confidential materials: Make An Electronic Filing

CONFIDENTIAL DOCUMENTS

No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by emailing the material to Jeff.Gaudiosi@ct.gov with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed electronically.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. §1-200 et. seq. In those exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion must be appended to the Motion. The Authority will rule on the Motion forthwith, and it will give further direction as necessary.

The current service list for this docket is available on the Authority's website located at http://www.dpuc.state.ct.us/DPUCPublicList.NSF.

By the Direction of the Authority,

PUBLIC UTILITIES REGULATORY AUTHORITY



Jeffrey R. Gaudiosi, Esq.
Executive Secretary

Enclosure
cc: Service List

DOCKET NO. 26-05-10
APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES

Interrogatories RSR-032 through RSR-045 are directed to The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) and refer to the Company's request to amend its rate schedules (Application).

RSR-032 (ENVIRONMENTAL REMEDIATION) See, e.g., Application, Ex. CLP-ENV-1, pp. 15, 20. Provide the following information regarding the Company's compliance with Connecticut's Release-Based Cleanup Regulations (RCBRs), Conn. Agencies Regs. § 22a-134tt-1 et seq., and any other applicable standards, statutes, or regulations:

a. A narrative description of all data reporting requirements, required approvals, and required communications with the Department of Energy and Environmental Protection (DEEP) and the Department of Public Health set forth in the RCBRs;
b. Any Remediation Action Plans (RAPs) and reports submitted to DEEP for each of the 19 complex environmental remediation sites;
c. Documentation showing RAP approvals or other approvals from DEEP; and
d. Any progress updates provided to DEEP.

RSR-033 (ENVIRONMENTAL REMEDIATION) Provide the following regarding the procurement of vendors to perform remediation work on the remediation sites since 2017:

a. The processes the Company followed to ensure costs reflect competitive market rates;
b. Copies of all RFPs the Company issued for and the number of respondents for each RFP;
c. All bids received for each solicitation; and
d. A description of how the Company promoted the RFP and ensured a competitive solicitation process.

RSR-034 (ENVIRONMENTAL REMEDIATION) Has DEEP imposed civil or criminal penalties on the Company or issued any orders to the Company to prevent or abate pollution at any time since January 1, 2017? If yes, provide complete details of each penalty and order.

RSR-035 (ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-ENV-1, pp. 28–29. Regarding Site #58 Enfield Area Work Center (AWC):

a. Confirm that remediation needs at this site are driven by the release of gasoline and diesel from underground storage tanks and by contamination from buried utility system debris. List any other factors driving remediation needs at this site;
b. Explain the origin of the buried utility system debris and describe whether CL&P has historically disposed of utility system equipment by burying it.

RSR-036 (ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-ENV-1, pp. 21–23. Regarding Site #5 Rockville Former Manufactured Gas Plant, the Company states that several distribution, transmission and gas related construction projects were completed at this site. Explain whether any of the remediation costs have been allocated to Eversource's gas, transmission, or other operating subsidiaries.

RSR-037 (ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-ENV-1, pp. 34–35. Regarding Site #103 Parsons Lane Durham Mineral Oil Dielectric Fluid Release:

a. Provide a copy of the settlement agreement;
b. Provide the total portion of project costs recovered through the settlement agreement and the portion of costs requested for recovery in this proceeding;
c. Explain why these costs are recovered through the deferred accounting mechanism rather than as a routine environmental remediation cost; and
d. Describe why the utility pole failed and provide the age of the pole at the time of failure.

RSR-038 (ENVIRONMENTAL REMEDIATION) Provide the following information regarding remediation associated with leaking or compromised underground storage tanks (USTs):

a. A narrative description of the requirements of Conn. Agencies Regs. § 22a-449(d)-1 et. seq.;
b. Records of installation, maintenance, inspection, and repair for each UST or associated component suspected of causing remediation costs;
c. The cost for each site resulting from the need to remediate pollution from the USTs;
d. A description of why the USTs failed, leaked or were otherwise compromised;
e. A description of how the Company routinely assesses the integrity of its USTs;
f. Whether the Company's insurance policies cover any amount of the costs resulting from compromised UST and the amount of insurance proceeds; and
g. Whether the Company has at any time been in violation of Conn. Agencies Regs. § 22a-449(d)-1 et. seq.

RSR-039 (ENVIRONMENTAL REMEDIATION) Application, Ex. CLP-ENV-1, pp. 29–30. Regarding Site #63 Berlin Settling Basin:

a. Explain the origin of contamination at this site;
b. Describe the remediation actions undertaken at this site; and
c. Provide an itemized breakdown of the remediation costs at this site.

RSR-040 (ENVIRONMENTAL REMEDIATION) Describe the circumstances that would lead to CL&P receiving proceeds from an insurance claim. Additionally, provide an unlocked Excel workbook showing the insurance proceeds received for each site and for each year from Jan. 1, 2017, to Dec. 31, 2025.

RSR-041 (MAKE READY) Application, Ex. CLP-REVREQ-4. Explain how to cross-reference and identify related charges between the two worksheets "CLP-REVREQ-4" and "Non-Billable Reason."

RSR-042 (MAKE READY) Application, Ex. CLP-REVREQ-4. Define each code in worksheet "Non-Billable Reason" under the "field work order" column for lines 7,501 through 7,548. For each code show how the associated deferred expenses (or refunds) are associated with allowable deferred make ready expenses.

RSR-043 (MAKE READY) Application, Ex. CLP-REVREQ-4. Explain the following regarding the worksheet "Non-Billable Reason" for work labeled "Prior to 5/11/22" under the "Non-Billable Reason" Column:

a. Define what "Prior to 5/11/22" means in this worksheet and whether this indicates that work was done prior to May 11, 2022; and
b. Describe the billable and non-billable cost allocation standards in place prior to May 11, 2022.

RSR-044 (MAKE READY) Application, Ex. CLP-REVREQ-4. Provide an updated exhibit showing the following:

a. date work orders were initiated;
b. date work associated with work orders was completed; and
c. date work orders were closed out.

RSR-045 (MAKE READY) Application, Ex. CLP-REVREQ-4. Explain what "Priority" means under column "Non-Billable Reason" and explain how charges under this code satisfy the criteria for non-billable make ready work.