STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF CL&P DBA EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES**	**:**	**DOCKET NO. 26-05-10**
		:	
		:	**OCTOBER 15, 2026**

MOTION OF THE OFFICE OF CONSUMER COUNSEL TO EXCEED THE STATUTORY LIMIT FOR CONSULTANT EXPESES

The Office of Consumer Counsel ("OCC") respectfully requests from the Public Utilities Regulatory Authority ("Authority") permission to exceed, for good cause, the default statutory limit for OCC's consultants in this docket, as permitted by General Statutes § 16-18a(a). The statute provides that the Authority shall "limit the reasonable and proper expenses for such services to not more than two hundred thousand dollars for each agency per proceeding involving a public service company . . ." but that ". . . the Office of Consumer Counsel may exceed such limits for good cause."[1] Good cause exists for the enlargement of the spending limit for consultants in this matter because this application includes pre-filed testimonies on seventeen different topics, supported by approximately 124 separate exhibits. Because it has been so long since Eversource's last rate case, OCC and its consultants must review the previous eight years of costs incurred by Eversource, in addition to the next four years of proposed costs included in Eversource's request. Additionally, OCC and its consultants must examine Eversource's proposed performance based rate design, which differs significantly from that discussed in the reopeners to Docket No. 21-05-15. Finally, OCC must examine substantiation associated with fourteen different storms (filings so voluminous Eversource originally indicated it was too

[1] *See also* General Statutes § 16-2a(e), authorizing the Consumer Counsel to "employ from time to time outside consultants knowledgeable in the utility regulation field including, but not limited to, economists, capital cost experts and rate design experts."

difficult to redact them).

OCC has made good-faith efforts to limit consultant budgets for this proceeding, but notes that consultant pricing has significantly increased over recent years in keeping with the general inflationary movement of the overall economy. OCC also notes that the $200,000 per-docket limit was established in Public Act 92-25, which was signed by Governor Weicker on May 5, 1992, and has never been increased. The present inflation-adjusted value of $200,000 in May of 1992 is approximately $479,570.[2] Taking inflationary impacts and the unusual enormity of this proceeding, OCC seeks permission to increase the spending limit to $500,000 for this docket to cover the expected costs that the agency will likely incur.[3] OCC will continue to work with our retained consultants to keep costs as minimal as possible.

To date, OCC's consultants have assisted with the formulation, drafting, and issuance of almost 1000 interrogatories, have assisted with the review of hundreds of interrogatories issued and answered by other parties and intervenors, and are currently assisting with drafting and sponsoring at least five sets of pre-filed testimony on nine separate topics.

Although OCC understood at the beginning of this proceeding that Eversource's choice not to file a rate case for so many years would result in an unprecedented amount of material in this docket, unfortunately, OCC is now fully appreciating the tremendous burden resulting from Eversource's choice. Eversource has requested to increase customer bills by an average of $33 per month, reflecting a 50% increase in the delivery component of the bills. Further, as the Authority recently indicated in its Ruling on Motion No. 43, every aspect of Eversource's

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[2] *See* U.S. Bureau of Labor Statistics, CPI Inflation Calculator, available at https://www.bls.gov/data/inflation_calculator.htm (comparing $200,000 in May of 1992 to August 2026; September 2026 comparison is not yet available).

[3] Even with the increased budget, there are insufficient funds to engage a Total Factor Productivity ("TFP") consultant and produce a TFP study, as such studies are quite expensive. This cost prohibition should be planned for in future rate cases.

voluminous rate application will be considered in the short time frame this proceeding offers. As a result, OCC believes this rate application, in particular, deserves to fully benefit from the expertise that consultants can offer on a variety of topics.

OCC continues to utilize its internal staff in their full capacity as they work on this proceeding as well as the numerous other dockets that continue despite two pending rate cases, but continued consultant engagement will be necessary throughout the surrebuttal, hearings, and briefing. OCC remains vigilant about containing its consultant costs in this matter, knowing that those costs are ultimately borne by Eversource ratepayers; however, OCC considers the money invested in expert advice and opinions in this proceeding to be well-spent in furtherance of OCC's statutory mission to advocate for the interests of Eversource consumers. Therefore, based on good cause presented herein, OCC respectfully requests that the Authority expand the amount that OCC can spend on consultants in this proceeding to up to $500,000.

OCC thanks the Authority for its consideration.

Respectfully submitted,
STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: */s/ Andrew W. Minikowski*

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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 15th day of October, 2026.

/s/ *Andrew W. Minikowski*
Commissioner of the Superior Court