Date Filed: October 05, 2026

Witness: Leanne M. Landry and Jeffrey D. Turano
Request from: Office of Consumer Counsel

Question:

Summed across 2017 through 2025, Exhibit CLP-ADDITIONS-3 shows annual programs and annual work orders of approximately $2,289.8 million of the net distribution plant additions. For each annual program and annual work order, provide the authorization documentation required under the Project Authorization Policies at Exhibits CLP-ADDITIONS-10A and 10B, or, if no project-level authorization was required, identify the approval governing the annual amount and the policy provision permitting it.

Response:

Please refer to Exhibits CLP-ADDITIONS-6 and CLP-ADDITIONS-12 where the Company has provided Project Authorization Forms and Annual Capital Plan Books, respectively.

CLP-ADDITIONS-1, beginning on page 25, also notes the following with regard to annual projects and their approval process:

A large volume of work occurs on the system on a daily basis associated with projects that are repetitive, numerous, and routine. These jobs are authorized in the aggregate, or by an annual program authorization. Individual review and authorization of each of these thousands of work orders is not necessary because the jobs are small in scope and highly repetitive in nature – therefore, the costs are highly consistent with the same cost drivers occurring over and over. Reviewing and approving each of these projects independently would require increased staffing levels for little or no marginal benefit, would unnecessarily slow the entire process down, and would negatively impact the Company's ability to undertake routine jobs on a reasonable schedule to continue to provide safe and reliable service. In essence, annual programs represent non-discretionary operational programs required to efficiently operate the electric distribution system. Typically, these program budgets are set each year based on historical averages that may fluctuate depending on supply chain challenges driving up material prices (e.g., pre-capitalized transformers) and customer growth or retraction (e.g., new customer connection annual). The review and approval of annual programs has evolved. Prior to 2024, these programs were documented and supported by the Company's capital book which is sent to the Board of Trustees in January/February of each year. This serves as documentation and approval of the capital plan. Prior to 2024, Eversource managed and balanced its capital plan across the Company and all other entities. Monthly workplans and financial reports sent to Operations and Finance leadership served as the monitoring tool. Since the annuals were based on historical estimates, there were

variances, both plus and minus, across the years. Following the RAM hearings at PURA in 2023 and a discussion on annual project documentation, beginning in 2024, the annual programs now have project authorization documents in addition to the Capital Book. Also, beginning in 2018, these annuals have been summarized in the annual RAM/ESI filing with an annual filing requirement to summarize budget versus actual variances greater than +/- 10%. To support the variances in the annuals from 2018-2025, the Company included these variance explanations in the project documentation support.