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**
		:	**AUGUST 18, 2026**

THE OFFICE OF CONSUMER COUNSEL'S EIGHTH 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 1, 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-409 through OCC-422 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):

OCC-409. (STORM) Please refer to Exhibit ACCT-2 (CLP-13A-5) (MN25K). The following questions pertain to Invoice #IN0001536-R3 and supporting documents (p. 12-23).

a. P. 16-23, please provide an explanation of the handwritten edits performed on these documents. Who was responsible for the editing of these documents, Eversource or the contractor?

b. P. 16 & 17, per review, it was noted that the travel time from Manchester, ME to Portsmouth, NH was 5 hours. Estimated travel time is approximately 2 hours. Per review, it was noted travel time from Portsmouth, NH to Newtown, CT of 5 hours. Estimated travel time is approximately 3 hours. Please provide additional information regarding the trips and an explanation of the significant difference between the actual travel times and estimated travel times.

c. P. 18, provide any additional information regarding the work performed by the crew from the start of the workday (11:00 AM) to the start of the first recorded event (1:00 PM). Provide any additional information regarding the work performed by the crew from the last recorded event (5:00 PM) to the end of the workday (10:00 PM). Please provide an explanation of the work performed during the events described as 'completed on arrival'.
d. P. 19, provide additional information regarding the work performed by the crew from the start of the workday (11:00 AM) to the start of the first recorded event (3:00 PM).
e. P. 20, provide additional information regarding the work performed by the crew from the start of the workday (6:00 AM) to the start of the first recorded event (7:30 AM).
f. P. 21 & 23, provide additional information regarding the delay in the approval by the Eversource representative, dated 3/25/25.
g. P. 22 & 23, per review, it was noted that the travel time from Ridgefield CT to Manchester, ME was 6 hours. Estimated travel time is approximately 4.25 hours. Please provide additional information regarding the trips and an explanation of the significant difference between the actual travel times and estimated travel times.

OCC-410. (STORM) Please refer to Exhibit ACCT-2 (CLP-13A-7) (MN25K). The following questions pertain to Invoice #3233R1 and supporting documents (p. 189-197).
a. P. 189, per review of the invoice, it was noted a quantity of 4 was charged for the 'General Foreman Travel/Standby Response Rate' when only 2 hours for 1 worker was recorded. A quantity of 31 was charged for the 'EO/Field Mechanic A Emergency Response Working Rate' when only 27 hours for 1 worker was recorded. Provide additional context as to why Eversource was charged for additional hours regarding these two items within the invoice.
b. P. 191, please provide additional information regarding the travel time per the Demobilization Time Report exceeding the travel time per the Mobilization Time Report by 1 hour. Travel from Torrington, CT to Windsor, CT is approximately 1 hour.

OCC-411. (STORM) Please refer to Exhibit ACCT-2 (CLP-13A-7) (MN25K). The following questions pertain to Invoice #250012 and supporting documents (p. 198-205).
a. P. 201 & 202, provide any additional information regarding the work performed by the crew from the start of the workday (12:00 PM) to the start of the first recorded event (3:15 PM). Provide any additional information regarding the work performed by the crew from the last recorded event (8:05 PM) to the end of the workday (10:00 PM). Please indicate if the sign-off date by the contractor representative was 12/18/25.

b. P. 203 & 204, provide any additional information regarding the work performed by the crew from the start of the workday (6:00 AM) to the start of the first recorded event (8:16 AM). Please indicate if the sign-off date by the contractor representative was 12/18/25.

OCC-412. (STORM) Please refer to Exhibit ACCT-2 (CLP-13A-7) (MN25K). The following questions pertain to Invoice #250011 v1 and supporting documents (p. 206-216).

a. P. 209, noted travel time from Newington, CT to Chesire, CT of 3 hours. Estimated travel time is approximately 30 minutes. Please provide additional information regarding the trip and the significance of the difference between the actual travel time and estimated travel time.
b. P. 210, noted inconsistency with the start and end of the workday compared to the start and end time of the event within the work report. Please provide additional information regarding the hours worked and description of work by these crew members on 2/16/25.
c. P. 212, please explain the description 'Ghost Call' and the work performed during the time of this event.
d. P. 213, provide any additional information regarding the work performed by the crew from the last recorded event (6:00 AM) to the end of the workday (8:00 AM). Please indicate if the sign-off date by the contractor representative was 12/18/25.
e. P. 214, please describe the work performed during the 'Ghost Call' events from 2:00 PM to 5:00 PM and from 8:00 PM to 9:00 PM. Provide any additional information regarding the work performed by the crew from the last recorded event (9:00 PM) to the end of the workday (12:00 AM).
f. P. 215, please describe the work performed during the 'Ghost Call' event from 12:00 AM to 1:00 AM. Provide any additional information regarding the work performed by the crew from the last recorded event (1:00 AM) to the end of the workday (6:00 AM).
g. P. 216, provide additional information regarding the sign-off on the Demobilization Time Report in June by the contractor representative and Eversource representative. Why was this report signed and dated after the date of the invoice on 6/6/25?

OCC-413. (STORM) Please refer to Exhibit ACCT-2 (CLP-13A-9) (MN25K). The following questions pertain to Invoice #J002315 and supporting documents (p. 1-48).

a. P. 25-27, provide any additional information regarding the work performed by the crew from the start of the workday (11:00 AM) to the start of the first recorded event (2:30 PM).

b. P. 28-30, provide any additional information regarding the work performed by the crew from the start of the workday (6:00 AM) to the start of the first recorded event (8:00 AM).
c. P. 35-37, provide any additional information regarding the work performed by the crew from the start of the workday (11:00 AM) to the start of the first recorded event (1:30 AM). Provide any additional information regarding the work performed by the crew from the last recorded event (6:30 PM) to the end of the workday (10:00 PM).
d. P. 38-40, provide any additional information regarding the work performed by the crew from the start of the workday (6:00 AM) to the start of the first recorded event on each page.
e. P. 44-45, provide any additional information regarding the work performed by the crew from the last recorded event to the end of the workday (10:00 PM) on each page.

OCC-414. (STORM) Please refer to Exhibit ACCT-2 (CLP-13A-9) (MN25K). The following questions pertain to Invoice #1083R2 and supporting documents (p. 49-78).
a. P. 59-65, provide any additional information regarding the work performed by the crew from the last recorded event to the end of the workday (10:00 PM) on each page. Provide additional information regarding the events with missing start and end times and the events with missing description of work.
b. P. 66, provide additional information regarding the work performed by the crew for this day. Given there is no event start time or end time, how did Eversource determine the crew worked for 14 hours this day?
c. P. 67-74, provide any additional information regarding the work performed by the crew from the start of the workday (5:00 AM) to the start of the first recorded event on each page. Provide any additional information regarding the work performed by the crew from the last recorded event to the end of the workday (9:00 PM) on each page. Provide additional information regarding the events with the missing start times and description of work.

OCC-415. (STORM) Please refer to Exhibit ACCT-2 (CLP-13A-15) (MN25K). The following questions pertain to Invoice #23118R and supporting documents (p. 1-65).
a. P. 4 & 5, provide any additional information regarding the work performed by the crew from the start of the workday (1:00 PM) to the start of the first recorded event (4:00 PM).
b. P. 6, provide any additional information regarding the work performed by the crew from the last recorded event (10:45 PM) to the end of the workday (2:00 AM). Please provide an explanation of the work performed during the events described as ‘completed on arrival’ and ‘No issue found’.

c. P. 7, provide any additional information regarding the work performed by the crew from the last recorded event (9:30 PM) to the end of the workday (2:00 AM). Please provide an explanation of the work performed during the event described as 'completed on arrival'.
d. P. 8 & 9, provide any additional information regarding the work performed by the crew from the last recorded event (8:15 PM) to the end of the workday (10:00 PM). Please provide an explanation of the work performed during the event described as 'OK on arrival'.
e. P. 10 & 11, provide any additional information regarding the work performed by the crew from the start of the workday (6:00 AM) to the start of the first recorded event (8:30 AM). Provide any additional information regarding the work performed by the crew from the last recorded event (2:00 PM) to the end of the workday (4:00 PM). Please provide an explanation of the work performed during the event described as 'OK on arrival'.

OCC-416. (STORM) Please refer to Exhibit ACCT-2 (CLP-13A-18) (MN25K), Invoice #O784TE449, p. 1-10. Explain why this invoice for work done on 3/3/25 to 3/5/25 was included for the MN25K event.

OCC-417. (STORM) Please refer to Exhibit ACCT-2 (CLP-13A-18) (MN25K), Invoice #4023-01, p. 69-84. Explain the reason for deploying a crew from Chicago, IL and justify the hours allocated for this crew to travel and be on standby. Were there any additional charges billed regarding this crew, such as flights?

OCC-418. Please identify all ways in which the Connecticut AMI proposal depends on, reuses, assumes, or allocates costs from Eversource's Massachusetts AMI deployment, including meters, communications network, head-end system, MDMS, CIS, load settlement, customer portal, Green Button Connect, vendor contracts, system integrations, data models, and implementation work products. Provide all Massachusetts AMI lessons-learned documents, issue logs, risk registers, defect logs, vendor performance materials, and internal presentations concerning data latency, MDMS/CIS integration, customer data access, third-party access, supplier access, demand response, or ISO-NE settlement readiness.

OCC-419. Referring to Exhibit CLP-AMI-3, Page 17 of 206, Figure 7, "Annual Nominal Costs and Benefits Over 20 Years," row "Load Settlement," which identifies Load Settlement costs of $65.8 million nominal and $39.4 million NPV, please provide all native Excel workpapers, models, vendor estimates, RFP responses, contracts, scopes of work, assumptions, and calculations supporting these amounts, with formulas, links, pivot tables, macros, named ranges, and source tabs intact. Identify all costs for capital, O&M, software licenses, integration, data conversion, testing, cybersecurity, annual support,

contingency, and any Massachusetts cost sharing with the AMI technology proposed in Connecticut.

OCC-420. For every AMI benefit claimed in the Connecticut BCA, please provide a matrix identifying the specific meter, communications network, head-end, MDMS, CIS, customer portal, Green Button Connect, load settlement, OMS, VVO, analytics, cybersecurity, and data-storage functionality required to achieve that benefit. For each required capability, state whether it is included in the Connecticut AMI cost estimate, excluded, dependent on another Eversource project, dependent on the Massachusetts AMI implementation, or not yet designed.

OCC-421. Please state whether the Company has analyzed the impact of 1-, 2-, 3-, and 5-year delays in load settlement, customer or third-party/supplier data access, TVR, demand-response, or ISO-NE settlement functionality on the AMI BCA or customer bill impacts, and provide any such analyses.

a. If not, please calculate these scenarios using the Company's existing BCA model and provide the resulting BCR, net benefits, and customer bill impacts.
b. Please provide any analyses comparing the selected Massachusetts/Connecticut AMI technology architecture to alternative vendors or designs that could provide lower-cost, lower-latency, or more complete settlement, customer-data, TVR, or demand-response functionality.

OCC-422. Please refer to Exhibit CLP-Rates-1, p. 12, in which the Company states that it developed a time-varying rate (TVR) Outreach, Education, and Engagement plan "in consultation with the OCC."

a. Please confirm that OCC and Eversource only met once, on July 1, 2026, and OCC explained it had not had time to do a complete review of the proposed Outreach, Education, and Engagement Plan.
b. Please confirm that in the meeting on July 1, 2026, OCC explained that Public Act Section 20 requires the Company to file an opt-out TVR proposal no later than October 1, 2027.
c. Please confirm that in the meeting on July 1, 2026, OCC indicated it had concerns about issuing the Outreach, Education, and Engagement Plan for an opt-in only TVR if the law requires the Company to file an opt-out TVR only months after the current rate case's decision.
d. Please confirm that in the meeting on July 1, 2026, OCC explained that it could not "approve" the Outreach, Education, and Engagement Plan as proposed, without additional information about the types of TVR being implemented.
e. Please explain how the Company intends to comply with Public Act Section 20.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Andrew W. Minikowski
Andrew W. Minikowski, Esq.
Agency Legal Director
10 Franklin Square
New Britain, CT 06051
860.827.2924

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 18th day of August, 2026.

By: /s/ Andrew W. Minikowski
Andrew W. Minikowski, Esq.
Commissioner of the Superior Court