Date Filed: October 08, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Follow-up to ICC-008 — missed timeframes and ISO-NE review.) The Company's response to ICC-008 states that a missed Guideline timeframe "does not, by itself, advance the project to the next stage, waive screens or studies, or require issuance of an Interconnection Agreement," and that "ISO-NE review required for projects greater than 1 MW is outside the state Guideline clocks and can extend the overall." (a) For each Allco Application, identify each Guideline timeframe the Company did not meet, the applicable Guideline section, the date the timeframe expired, the reason it was missed, whether Allco requested a status update, and whether the Company provided the three-business-day response described in ICC-008. (b) Identify the statute, regulation, Guideline provision, ISO-NE tariff or procedure, or Company practice on which the Company relies for the statement that ISO-NE review is "required for projects greater than 1 MW," and state when the Company began applying that requirement. (c) For each Allco Application greater than 1 MW, state the date the Company referred the application to ISO-NE, the date of ISO-NE's determination, the outcome, any study or fee required, and the elapsed time between application and issuance of an interconnection agreement. (d) State whether any provision of the Guidelines authorizes the Company to withhold issuance or countersignature of an interconnection agreement pending ISO-NE review, and identify it.

Response:

CL&P objects to this request on the ground that it is an improper effort by ALLCO to use this rate case proceeding to obtain discovery for purposes of a lawsuit that it filed against the Company on August 10, 2026, in the United States District Court for the District of Connecticut (Civil Action No. 3:26-cv-1277), outside of and in contravention of the rules of procedure that govern discovery in that lawsuit.

CL&P further objects to this request on the ground that it is not within the scope of the proceeding to review the Company's application to amend its existing rates schedules because the interrogatory either seeks information specific to Allco projects or seeks information that Allco views as relevant to its specific projects.