Date Filed: October 08, 2026

**Witness: Counsel**
**Request from: ALLCO**

**Question:**

(Windham Solar Facilities — estimate, collection, actual cost, and reconciliation.) With respect to the interconnection of the Windham Solar Facilities: (a) state the Company's estimate of Upgrade costs as set out in Appendix G of the Interconnection Agreements as executed in May 2016 and as revised by each subsequent amendment, and the date of each; (b) state each amount the Company collected from Windham Solar LLC for interconnection costs, the date collected, and the account in which it was recorded; (c) state the actual cost recorded in the Company's books for the Upgrades and interconnection facilities constructed for the Windham Solar Facilities, by work order and cost element, including any overhead or CIAC loaders applied, and produce the work-order cost detail in native format; (d) state each amount refunded or credited to Windham Solar LLC, the date, and the basis; (e) state whether the Company performed a final accounting or reconciliation of actual to estimated costs for that interconnection, and if so its date and result, and if not, why not; and (f) state the amount, if any, by which amounts collected exceeded the actual cost recorded in (c), and the current disposition of any such excess.

**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.