Date Filed: October 08, 2026

Witness: Counsel
Request from: ALLCO

Question:

(Windham Solar Facilities — transfer-trip and substation components; post-2017 charges.) (a) State the estimated and the actual cost of the transfer-trip scheme and of the substation work included in the Upgrade estimate for the Windham Solar Facilities, identify the technology installed (power-line carrier, fiber optic, or other), and state who bore the cost of each. (b) Identify every charge billed to or withheld from Windham Solar LLC in connection with the Lebanon interconnection since September 1, 2017, including any operations and maintenance, ongoing, study, metering, or upgrade charge, stating the amount, date, and basis of each, or state that there have been none.

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.