Date Filed: October 19, 2026

Witness: Brendan J. O'Brien and Garrett J. Murray
Request from: ALLCO

Question:

(Follow-up to ALLCO-033 — outside legal expense by matter.) The response states that the Company "does not track or maintain information on outside legal expense in a format that is commercially reasonable" to provide, and supplies a vendor list by category. (a) State whether the Company's outside counsel invoices identify a matter name or number, whether the Company's accounts-payable or legal e-billing system records a matter identifier for each invoice, and identify the system. (b) For each vendor in ALLCO-033, Attachment 1, with Test Year expense exceeding $50,000, list each matter billed in the Test Year with the amount, the nature of the matter (as requested in ALLCO-033(a)), whether the Company was claimant or respondent, and whether it is concluded. (c) For Day Pitney LLP ($164,213) and Cowdery Murphy & Healy LLC ($511,973), state whether any portion of the Test Year expense relates to Allco, its affiliates, Windham Solar LLC, distributed generation interconnection disputes, FERC Docket No. EL25-117-000, or the SCEF program, and the amount. (d) For Keegan Werlin LLP ($1,210,144) and Steptoe & Johnson ($289,469), state the portion of the Test Year expense that relates to the preparation of this Application or to any proceeding described in Conn. Gen. Stat. § 16-243p(b), and identify where in Exhibit CLP-REVREQ-9, or the revenue requirement those amounts appear. (e) Describe the $233,397 of storm attestation work "initially recorded to the legal cost element," state when and how it was discovered, identify every other schedule or exhibit in which it appears, and state whether the Company has reviewed the remaining $506,602 of "Misc. Accounting Other" for similar misclassification. (f) Produce OCC-308, Attachment 1, under the protective order with the amount billed in the Test Year added for each matter.

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.

Without waiving said objections, the Company responds as follows:

a. Please refer to ALLCO-027, Attachment 10. For all outside counsel legal matters there is a legal matter number. The Legal Department utilizes the Thompson Reuters Legal Tracker e-billing system for the management of its outside counsel legal matters. The outside counsel firms submit their attorney-client privileged detailed legal invoices to the Eversource attorney that is responsible for a legal matter.

b. As the Company stated in its response to this same request in ALLCO-033[i], CL&P does not track or maintain information on outside legal expense in a format that is commercially reasonable for the Company to collect and provide during the time period designated by Allco for the submission of this interrogatory response.

c. Please refer to the Company's response to ALLCO-019[ii].

d. Please refer to ALLCO-027, Attachment 9, for a summary of billed rate-case expenses by vendor through June 30, 2026, and ALLCO-027, Attachment 10, which includes $8,260.50 of KW 2025 rate case costs.

e. Please refer to the Company's response to ALLCO-033[i]. The Company has reviewed the transactions and notes that no further adjustments are necessary.

f. Please refer to OCC-308, Attachment 1, which lists settlement amounts from 2021 through 2025. This attachment does not list outside legal expense. Please also refer to the Company's response to OCC-308[iii], subpart (b).

Prior Referenced Responses:

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[i] ALLCO-033 Question:

With respect to the outside legal expense itemized by vendor in the Company's response to OCC-309, Attachment 1: for each vendor listed, provide a breakdown of the Test Year (2025) expense by matter, stating for each matter: (a) a description of the matter sufficient to identify its nature — for litigation, the court and caption (or, if privilege is asserted as to a caption, the category of dispute and the adverse party's relationship to the Company, e.g., customer, developer, contractor, employee, regulator); for regulatory matters, the agency and docket number; and for transactional, collections, employment, or other matters, the category; (b) the amount billed to or allocated to the Company for that matter in the Test Year; (c) whether the Company (or an affiliate) is the plaintiff/claimant or the defendant/respondent in the matter; (d) whether the matter has been concluded or remains pending; and (e) the FERC account charged and whether the amount is included in the proposed Rate Year revenue requirement (including through the GDP-PI escalation applied in Schedule C-3.20). This interrogatory seeks matter-level detail for the Test Year amounts only and does not repeat OCC-309, or Q-ALLCO-019.

ALLCO-033 Response:

CL&P does not track or maintain information on outside legal expense in a format that is commercially reasonable for the Company to collect and provide during the time period designated by Allco for the submission of this interrogatory response.

Subject to and without waiving the foregoing, please refer to ALLCO-033, Attachment 1, for a listing of CL&P's legal service costs incurred in the Test Year (2025) and any adjustments for the Rate Year. In the course of responding to this interrogatory the Company identified storm attestation work initially recorded to the legal cost element and should have been removed in the preparation of the initial cost of service and therefore has been adjusted out of this attachment. The Company plans to incorporate this update in its next applicable cost of service update. To prepare this listing , the Company identified the category of legal services provided and identified the direct or allocated charges. Legal costs are either directly charged to CL&P when the Company is the only beneficiary of the services, or allocated when multiple business segments benefit from the activity. The Company confirms that the totals on line 145 of OCC-309, Attachment 1, are the amounts charged to CL&P. Please also refer to OCC-308, Attachment 1 CONFIDENTIAL, for a list of litigation, status of the matter and the dates these legal matters were resolved.

[ii] ALLCO-019 Question:

With respect to the injuries and damages expense, judgments and settlements, and outside legal expense that are the subject of OCC-303, OCC-308, and OCC-309, identify the portion of each that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers (including disputes with Allco or its affiliates), stating the amount, FERC account, and matter; and state whether the Company proposes to recover through rates any judgment, settlement, refund, or interest obligation arising from such disputes.

ALLCO-019 Response:

With respect to the Company's response to OCC-303, CL&P does not track injuries and damages expense in a format that would allow the Company to identify the portion of expense that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers.

With respect to the Company's response to OCC-308, there are no judgments and/or settlements resulting from lawsuits brought by distributed generation developers, qualifying facilities, or interconnection customers.

With respect to the Company's responses to OCC-309, CL&P does not track legal expense in a format that would allow the Company to identify the portion of expense that relates to disputes with distributed generation developers, qualifying facilities, or interconnection customers.

[iii] OCC-308 Question:

Judgments/Settlements (Direct and Allocated).

a. Please provide, in list form, the details of all judgments and/or settlements resulting from suits brought which involved the Company or affiliates as a defendant, which resulted in the Company or affiliates, during the test year, paying or agreeing to pay or being ordered to pay an amount in excess of $10,000, including but not limited to the case name, a brief description of the case, the date filed, the date of settlement or the date of judgment and the amount the Company or affiliates was ordered or agreed to pay. Provide this information even if appeals are pending and note every instance of an appeal.

b. Provide the total amount of judgments/settlements expense (direct and allocated) for each of the years 2021, 2022, 2023, 2024, 2025, and the amount included in the rate year.

OCC-308 Response:

a. Please refer to OCC-308, Attachment 1 CONFIDENTIAL, for a list of all judgements and/or settlements resulting from suits brought in federal or state court, which resulted in the Company either paying or agreeing to pay an amount in excess of $10,000 during the years 2021, 2022, 2023, 2024, and 2025.

b. Settlements and judgments that are property damage or bodily injury claims are funded out of the Company's public liability reserve up to $1 million. Property damage and bodily injury settlements and judgements over $1 million are covered by the Company's excess liability insurance. The Company has included $3.829 million in its Rate Year to accrue into the public liability reserve which is recovered from customers through base distribution rates. The table below summarizes the public liability expense for each year 2021 through 2025 and the legal settlement payments that are not covered by the Public Liability Reserve and excess liability insurance.

The Public Liability Reserve Accrual values are included in herein are from OCC-303, Attachment 2.

Year	**Public Liability Reserve Accrual**	**CL&P Legal Settlements Payments**
2021	$ 616,606	$ 21,041
2022	$ 10,474,004	$ 320,000
2023	$ 6,015,776	$ 1,030,000
2024	$ 1,340,332	
2025	$ 2,923,957	