**STATE OF CONNECTICUT**
**PUBLIC UTILITIES REGULATORY AUTHORITY**

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| **RE:** | **APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES** | **:** | **DOCKET NO. 26-05-10** |
| | | **:** | **OCTOBER 27, 2026** |

# THE OFFICE OF CONSUMER COUNSEL'S THIRTIETH 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 **November 10, 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-984 through OCC-1014 are directed to the Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource" or "Company"):**

OCC-984. (ELECTRIC HEATING CUSTOMERS)
a. How does the Company currently identify customers who heat using electricity (e.g., electric resistance heating, heat pump, etc...)?
b. How many customers does the Company have who heat with electricity? (please clarify in this response how the Company determined the number of customers and if the response relies solely on the answer to subpart a).

OCC-985. (STORM OVERTIME) Please refer to the Response to OCC-945, Attachment 1. Please complete the same for all storms in 2024.

OCC-986. (AFFORDABILTY) Please refer to the Response to OCC-957, Attachment 1.
a. Please indicate the all-in rate used in each assumed monthly bill.

b. Please provide the same calculation assuming 1200 kWh/month usage for Rate 5.

OCC-987. (USAGE) Please provide the average residential customer (separated by Rate 1 and Rate 5, excluding Rate 7) usage for each month of the calendar years 2021-to present.

OCC-988. (CYBERSECURITY) Please refer to the Response to OCC-768. There the Company indicated "Yes" to the question of if it had ever determined, through its vendor security review process, that a prospective or existing vendor's security controls or practices were insufficient; however, the Company answered the remaining of the question regarding only what "may" occur in such circumstances, not what did occur. Please indicate from 2018 to the present:

a. each incident in which the Company determined through its vendor security review process that a vendor's security controls or practices were insufficient;
b. what services that vendor provided;
c. what specific security deficiencies were identified;
d. whether the vendor was permitted to proceed or continue providing services; and
e. what specific action(s) the Company took in response.

OCC-989. (BOARD OF DIRECTORS) Please refer to the Response to OCC-263. Is the Company stating that there are no costs or compensation associated with the Board of Directors paid for by CL&P ratepayers? If there are any costs, please provide for the years 2021-2025 and describe.

OCC-990. (BRIDGE METERS) Please list and explain all functions of the bridge meter(s) the Company uses (i.e., not functions that the meter is capable of, but functions that the Company uses) that differ from an AMR meter.

OCC-991. (BRIDGE METERS) Please provide an unlocked Excel file indicating: the date the Company installed each of the 467,145 bridge meters; if the account associated with the meter is commercial or residential; and the bridge meters' manufacturer and model number. Please additionally provide all manufacturer's guides and/or specifications for the meters/model numbers listed.

OCC-992. (BRIDGE METERS) Please refer to the Response to OCC-943, where the Company states that bridge meters can facilitate time of use rates. Please clarify that the singular barrier to a current customer on a bridge meter being on a time of use rate is the Company's "supporting billing system and interval data management system." If this is not the singular barrier, please describe all other barriers.

OCC-993. (METER BILLING SYSTEM) Please indicate the month and year the Company's current billing system was installed and the month and year of any updates.

OCC-994. (INTERVAL DATA MANAGEMENT SYSTEM) Please indicate the month and year the Company's current interval data management system was installed and the month and year of any updates.

OCC-995. (BRIDGE METERS) Please provide the Authority decision and/or ruling approving the Company installing the 467,145 bridge meters it has installed.

OCC-996. (METERS) Please provide for each year from 2018 through the present the average unit cost of each type: of AMR meter(s) the Company installed; each type of bridge meter(s) the Company installed; and each type of AMI meter(s) the Company installed.

OCC-997. (MS24E) Please refer to the Response to OCC-955.

a. Please cite to the contractual provision contained in the contract with E-J Electric provided in response to OCC-44 that permits the vendor to begin billing at double time while traveling to a job work site.
b. Where was this crew housed/staying on the night of March 11, 2024?

OCC-998. (ACCOUNT NUMBERS) Referring to OCC-915 and OCC-916 Interrogatory Responses. Why does the Company state that it "**may** transfer the payment" instead of "**will**"?

OCC-999. (ACCOUNT NUMBERS) Referring to OCC-915 and OCC-916 Interrogatory Responses. For years 2021 –2026 in an Excel spreadsheet provide a list of customer accounts that had a customer incorrectly pay into a wrong account. Include the total which was paid to the wrong account. Include the total number of instances and instances per account impacted.

OCC-1000. (ACCOUNT NUMBERS) Referring to OCC-915 and OCC-916 Interrogatory Responses and OCC-992 interrogatory. For each customer account which had this customer account error provide the amount of payments/funds/money which was transferred to the correct account and amount of payments/funds/money which was NOT transferred to the correct account.

OCC-1001. (ACCOUNT NUMBERS) Referring to OCC-915 and OCC-916 Interrogatory Responses. Has the Company refused to transfer the payments/funds/money

customers made to incorrect accounts to correct accounts after payment verification is completed?

OCC-1002. (ACCOUNT NUMBERS) Referring to OCC-915 and OCC-916 Interrogatory Responses. Has the Company required customers to make additional payments in excess of the customer's bills because of an incorrect account error? Meaning the payments to the wrong account are not credited to the correct account.

OCC-1003. (ACCOUNT NUMBERS) Referring to OCC-916 Interrogatory Response. Why is it the customer's responsibility to verify proof of payment into the Company's own payment system?

OCC-1004. (VENDORS) For years 2021 – 2025 in an Excel spreadsheet provide the list of CL&P's largest 25 outside vendors/contractors/third-party business-related expenses and explanation how the Company tries to keep these vendors/contractors/third-party related business expenses under competitive bidding and or Company's active relationship and process management to keep costs similar to a market competition cost level.

OCC-1005. (ECONOMIC DEVELOPMENT FEES) Please refer to the Response to OCC-70, where the Company states, "The purpose of the Company's membership with these organizations is to facilitate a mutual assistance network among member utilities, which enables companies to mobilize personnel and equipment to support major restoration efforts."

a. Is the Company stating in this Response that membership in these organizations is necessary for mutual aid?
b. Do these organizations contribute to storm restoration in any manner other than mutual aid from other utilities? If so, please describe.
c. For the test year, please indicate for each storm if the Company relied on these organizations in its storm response and describe how.

OCC-1006. (Storm MS24J – Civil Crews) Refer to Exhibit ACCT-2 (CLP-11A-2) (MS24J) and ACCT-2 (CLP-11A-3) (MS24J). The following pertains to invoices from Charter Oak Utility Constructors Inc.:

a. Per review of invoices #38621 & #38705 and associated Excavation Job Forms, the work performed under work orders #RPEX0011 and #82780347. Provide additional context and explain how this work order relates to storm MS24J. If this work order number does not relate to the storm event, why was this included within the storm recovery costs?

b. Per review of invoice #38649, the work was performed on 8/19/24. Explain how the work performed within this form relates to storm MS24J given the work was performed during the timing of a minor storm event according to the data provided from EOE-0 Attachment 1.
c. Per review of invoice #38921, the work was performed on 9/6/24. Explain how the work performed within this form relates to storm MS24J given the work was performed after the storm event. How did the Company know this related to MS24J with other minor storms occurring after MS24J that could have caused the damage?

OCC-1007. (Storm MS24J – Civil Crews) Refer to Exhibit ACCT-2 (CLP-11A-3) (MS24J). The following pertains to invoice #N0817224B from HI Stone & Son, Inc. Per review of the Excavation Job Form, there is no submission date, work completion date, signature by the contractor, or signature by the Eversource approver and the form has work order #RMOU0011. Explain how the Company verified the invoices and work performed by these crews without reviewing the work or having a reference date. If additional support or information is to be considered regarding this work, please provide and explain why it was not originally included.

OCC-1008. (Storm MS24J – Civil Crews) Refer to Exhibit ACCT-2 (CLP-11A-4) (MS24J). The following pertains to KTI Utility Construction & Maintenance LLC. The description within the invoice notes work performed on 10/16/2024 and the invoice date of 10/19/24. Explain how the work performed within this invoice relates to storm MS24J given the work was performed two months after the event and other minor storm events occurred after MS24J that could have caused that damage. If additional information was utilized to determine the applicability to MS24J, please provide.

OCC-1009. (Storm MS24J – Civil Crews) Refer to Exhibit ACCT-2 (CLP-11A-7) (MS24J). The following pertains to McAllen Construction Inc. Per review of invoice #642024, only one event had a work order related to MS24J. Explain how the Company determined $6,525 of the cost related to MS24J per ACCT-2 (CLP-11) (MS24J) CONFIDENTIAL when the invoice recorded only $3,019.92.

OCC-1010. (Storm MS24J – Police & Traffic Control) Refer to Exhibit ACCT-2 (CLP-11A-1) (MS24J) and ACCT-2 (CLP-11A-2) (MS24J). The following pertains to C C Security Corp:

a. Per review of invoice #60622, the work performed relates to multiple events and it is unclear which field work orders relate to MS24J. Identify which work orders apply to MS24J within the invoice, if any.
b. Per review of invoice #60625, the work performed relates to multiple events and it is unclear which field work orders relate to MS24J. Considering only the work orders labeled MS24J011, explain how the Company determined $4,395 of the cost related to MS24J per ACCT-2 (CLP-11) (MS24J) CONFIDENTIAL. Provide a breakout of the total costs to be considered related to MS24J for this invoice.

OCC-1011. (Storm MS24J – Police & Traffic Control) Refer to Exhibit ACCT-2 (CLP-11A-2) (MS24J). The following pertains to Certified Utility Services Inc invoice #22531, p. 128. Explain how the flagger work recorded as part of this invoice related to MS24J given it occurred after the storm (8/15/2024).

OCC-1012. (Storm MS24J – Police & Traffic Control) Refer to Exhibit ACCT-2 (CLP-11A-3) (MS24J). The following pertains to Elite Flaggers LLC invoice #576, p. 102. Explain how the flagger work recorded as part of this invoice related to MS24J given it occurred two weeks after the storm (8/23/2024) and no work order is recorded identifying it as work related to MS24J.

OCC-1013. (Storm MS24J - P-CARDS) Refer to Exhibit ACCT-2 (CLP-11) (MS24J) CONFIDENTIAL, P-Card tab. Provide documentation to support the following P-Card expenses. As part of the response, please provide a description of the purchase, relevant invoices, and other supporting documents demonstrating the necessity and applicability of each charge to the MS24J event.
a. Row 39, Dave & Charles Homet, $169
b. Row 95, Portofinos, $129
c. Row 129, Newtown Deli LLC, $6,389
d. Row 144, Texas Roadhouse, $160
e. Row 164, The Village Table, $1,854
f. Row 171, WM Supercenter, $217

OCC-1014. (Storm MS24J – Employee Expense Reimbursement) Refer to Exhibit ACCT-2 (CLP-11) (MS24J) CONFIDENTIAL, Empl. Expense&Other tab. Provide documentation to support the following employee expenses. As part of the response, please provide a description of the purchase, relevant invoices, and other supporting documents demonstrating the necessity and applicability of each cost to the MS24J event.
a. Row 40, Employee Reimbursement, $182

b. Row 87, Employee Reimbursements, $1,142
c. Row 139, Employee Reimbursement, $586
d. Row 181, Meals - Employee Reimbursement, $35
e. Row 235, Meals – Employee Reimbursement, $50

Respectfully submitted,

**STATE OF CONNECTICUT**
**OFFICE OF CONSUMER COUNSEL**

**CLAIRE E. COLEMAN**
**CONSUMER COUNSEL**

By: /s/ Kimberly White

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**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 27th day of October, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court