STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

Docket No. 26-05-10

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY
D/B/A EVERSOURCE ENERGY
TO AMEND ITS RATE SCHEDULES

DIRECT TESTIMONY OF

MARC J. RICHARDS, GARY A. IADAROLA, AND CLARE B. CONNOLLY

Environmental Remediation Costs

On behalf of

The Connecticut Light and Power Company
d/b/a Eversource Energy

July 14, 2026

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MARC J. RICHARDS, GARY A. IADAROLA, AND CLARE B. CONNOLLY

I. INTRODUCTION

Q. Mr. Richards, please state your name and your business address.

A. My name is Marc J. Richards. My business address is 247 Station Drive, Westwood, Massachusetts.

Q. By whom are you employed and in what capacity?

A. I am employed as the Vice President of Sustainability and Environmental Affairs by Eversource Energy Services Company ("Eversource Service Company" or "ESC"), which provides centralized services to the operating subsidiaries of Eversource Energy ("Eversource"), including The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P" or the "Company") and Yankee Gas Services Company d/b/a Eversource Energy ("Yankee"). In this capacity, I am responsible for environmental protection, environmental site investigation and remediation, permitting for gas and electric transmission and distribution project siting, regulatory compliance, and sustainability commitments.

Q. Please describe your educational background and professional qualifications.

A. I have served in my current position since October 2023 and was previously a Director in Sustainability and Environmental Affairs for Eversource since October 2020. Before joining Eversource Service Company, I served as Senior Vice President of Tighe & Bond, an engineering firm where I managed the environmental business line, including providing environmental consulting services to the utility sector. The business line oversaw brownfields redevelopment, environmental assessment and remediation, hazardous building materials abatement and demolition design, and construction management issues. I also previously served as a Project Manager at VHB, a civil engineering consulting and design firm. I received my Master of Science in Environmental Engineering from Tufts University and my undergraduate degree in Civil Engineering from the University of Massachusetts Amherst.

Q. Have you previously testified before the Public Utilities Regulatory Authority?

A. Yes, I previously testified before the Public Utilities Regulatory Authority ("PURA") in Yankee's recent rate case, Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules. I have also testified before the Massachusetts Energy Facilities Siting Board in Docket No. EFSB 19-06A/D.P.U. 19-142A/19-143A/23-22.

Q. Mr. Iadarola, please state your name and your business address.

A. My name is Gary A. Iadarola. My business address is 107 Selden Street, Berlin, Connecticut.

Q. By whom are you employed and in what capacity?

A. I am the Manager of the Environmental Remediation Group of Eversource, which oversees compliance, monitoring, investigation, remediation and related activities in connection with the environmental management of properties and assets of the Eversource affiliates, including CL&P. As Manager, I am responsible for investigating and remediating contaminated electrical substations, area work centers ("AWC"), storm related releases, pipe type cable releases, former manufactured gas plant ("MGP") properties as well as many non-MGP properties throughout the Eversource system, and ensuring compliance with state, regional, and federal environmental requirements. I manage the budgeting for these sites, selection of consultants and contractors performing services at the sites, and regulatory interaction and reporting. Since joining Eversource in 2017, I have overseen and managed site investigations, risk assessments, feasibility studies, and remedial actions at various contaminated sites, including 37 MGP sites across the system.

In addition, I maintain the environmental liability reserve accounts for compliance with U.S. Securities and Exchange Commission regulations, conduct historical research and due diligence assessments, and am involved in Potentially Responsible Party negotiations.

Q. Please describe your educational background and professional qualifications.

A. I obtained a Bachelor of Science degree in Environmental Earth Science from Eastern Connecticut State University in 1983, and a Master of Science degree in Geology from

Boston College in 1994. I am a Connecticut Licensed Environmental Professional and Certified Professional Geologist. Prior to joining Eversource nine years ago, I worked in the environmental consulting field for 30 years, including 10 years working on utility sites owned by National Grid.

Q. Have you previously testified before PURA?

A. Yes. I provided testimony on environmental remediation issues in Yankee's last two rate cases, Docket No. 24-12-01 and Docket No. 18-05-10, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules.

Q. Ms. Connolly, please state your name and your business address.

A. My name is Clare B. Connolly. My business address is 247 Station Drive, Westwood, Massachusetts.

Q. By whom are you employed and in what capacity?

A. I am employed as Director of Sustainability and Climate for Eversource Energy Service Company.

Q. Please describe your educational background and professional qualifications.

A. I have a Bachelor of Science degree in Environmental Earth Science from Boston University, a Graduate Certificate in Sustainable Design from Boston Architectural College and a Master's Degree in Sustainability Management from Harvard University.

Prior to joining Eversource in 2020, I managed the Global Sustainability Program at Cabot Corporation and worked in sustainability and environmental consulting.

Q. Have you previously testified before PURA?

A. Yes. I provided testimony on sustainability issues during hearings in Yankee's last rate case, Docket No. 24-12-01. I have also testified before the Massachusetts Department of Public Utilities in D.P.U. 25-44/45.

Q. What areas does your testimony cover?

A. Mr. Richards and Mr. Iadarola provide testimony regarding environmental remediation, while Ms. Connolly provides testimony regarding the emissions scorecard metric proposed as part of the Company's Performance-Based Multi-Year Rate Plan (the "PBMRP").

Q. What is the purpose of your testimony?

A. The purpose of Mr. Richards and Mr. Iadarola testimony is to support the Company's recovery of environmental investigation and remediation costs, including costs associated with long-term clean-ups. Their testimony describes CL&P's environmental commitment to managing, investigating and remediating sites in compliance with federal requirements and Connecticut Department of Energy and Environmental Protection ("DEEP") regulations, and in accordance with Eversource's commitment to environmental compliance and sustainability. CL&P is committed to properly managing, investigating, and remediating its environmentally contaminated

sites in a cost-effective and environmentally protective manner. A high-level presentation of these efforts is provided in Exhibit CLP-ENV-2.

As part of this proceeding, the Company is requesting to continue to defer the costs associated with the annual investigation and remediation work performed at complex environmental sites to comply with state and federal requirements and to be consistent with the Company's environmental compliance and sustainability goals. The Company is also requesting recovery of the deferred environmental remediation costs incurred since its last rate case, as mitigated by insurance claims proceeds previously received. More specifically, the Company is requesting recovery of the projected deferred environmental remediation balance as of June 30, 2027 of $10.703 million[1] over four years, resulting in an annual amortization expense of $2.676 million. Additionally, the Company incorporated $1.930 million of annual environmental costs within its operations and maintenance ("O&M") expense, consistent with its last rate case to support day-to-day environmental activities.

The remediation of CL&P's complex environmental sites is already underway and is expected to continue over the next ten to thirty years. Some of these complex environmental sites will require long-term extraction of non-aqueous phase liquid,

[1] The Company has an actual balance as of December 31, 2025 of $7.420 million and is projecting additional deferred costs of $3.283 million through June 30, 2027.

ongoing post-remediation groundwater monitoring, engineered control/cap inspections, and financial obligations to maintain these activities.

The purpose of Ms. Connolly's testimony is to describe the Company's proposed Greenhouse Gas ("GHG") Emission Scorecard Metric, which is being submitted as part of CL&P's overall performance-based ratemaking framework, the PBMRP.

Q. Has PURA previously approved the deferral of and the recovery of complex environmental remediation costs through base distribution rates?

A. Yes, PURA has consistently approved deferral accounting for complex environmental remediation in the past. Environmental remediation costs, the deferral thereof, and subsequent recovery of those costs through base distribution rates has been an ongoing component of utility rate proceedings for several decades. PURA and its predecessor regulatory bodies have recognized that to the extent that remediation expenses are prudently incurred, they should be allowed as proper expenses. PURA has taken this approach over the years because deferred accounting is a public policy approach for environmental remediation activities that are required by law. See, e.g., Conn. Gen. Stat § 22a-6u; Conn. Agencies Regs. § 22a-134tt-1, *et seq*., for Release-Based Cleanup Regulations effective March 1, 2026.

For CL&P in particular, OCC and PURA Prosecutorial Staff, and the PURA Commission through approval of the 2018 Settlement Agreement, acknowledged that deferral accounting is a reasonable and proper treatment for environmental remediation costs and that it should continue beyond the term of one rate case or one settlement

agreement. Specifically, Section 8 of the January 11, 2018 Settlement Agreement states "Environmental remediation costs shall be recovered as follows: (i) The Company shall be allowed to recover its environmental remediation costs in accordance with the proposal described in the Application; and (ii) ***the Company is authorized to track and defer environmental costs for future review and recovery in each subsequent rate case***."[2]

Q. How are routine environmental costs recovered through base distribution rates?

A. PURA allows routine environmental costs to be recovered as operating expenses, as they are separate and distinct from the significant costs for complex environmental remediation. See Decision dated January 28, 2008, in Docket No. 07-07-01, Application of The Connecticut Light and Power Company to Amend Its Rate Schedules, at 32-33. As noted above, the Company has included $1.930 million in its O&M as part of the cost of service to account for the routine environmental costs.

Q. How is your testimony organized?

A. Our testimony is organized as follows. Section I is the Introduction. Section II provides an overview of CL&P's activities related to day-to-day environmental stewardship and complex environmental site investigation and remediation. Section III describes historic complex environmental remediation activities and deferred

[2] Appendix A of the Decision dated April 18, 2018, from Docket No. 17-10-46, Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend Rate Schedules. The April 18, 2018 Decision approves the January 11, 2018 Settlement Agreement as amended by the March 23, 2018 Amendment to the Settlement Agreement. Notably, PURA did not express any concerns with this provision or require modifications to this provision in its Interim Decision evaluating the January 11, 2018 Settlement Agreement.

expenses for environmental remediation at complex sites from 2017 to 2025. Section IV discusses upcoming remediation activities and projected expenses for environmental remediation for 2026 forward. Section V discusses the Company's proposed GHG emission reduction metric. Section VI is the conclusion.

Q. Are you sponsoring any exhibits as part of your testimony?

A. Yes, we are sponsoring the following exhibits:

Exhibit	Description
Exhibit CLP-ENV-1	Direct Testimony of the Environmental Panel
Exhibit CLP-ENV-2	Environmental Remediation Summary Presentation
Exhibit CLP-ENV-3	Summary of Environmental Remediation Project Expenses 2017 – 2025
Exhibit CLP-ENV-3 (A-1) through (A-19) CONFIDENTIAL	Invoices for Project Expenses since January 1, 2017
Exhibit CLP-ENV-4	List of Sites Spend (2017-2025)
Exhibit CLP-ENV-5	List of Sites Three Year Spend (2026-2028)

II. OVERVIEW OF ENVIRONMENTAL REMEDIATION ACTIVITIES AND COSTS

Q. What are the Company's day-to-day environmental remediation activities?

A. As the Company undertakes capital projects and normal business operations, it must be prepared to respond to emergent environmental concerns. In some instances when updating substations or responding to workplace spills, Connecticut Light and Power's

staff become aware of environmental response work that must be done. When this environmental response work is a predicate for capital upgrades, it is included as part of capital work plans. If the environmental response work is emergent, such as responding to a spill at an Eversource-owned facility, then the work is handled in the course of operations activities, as day-to-day emergency response by the Environmental Field Response team. CL&P considers these short-term types of environmental remediation work to be routine, regular, and part of day-to-day Company functions.

Q. What types of costs does CL&P incur for environmental response in its day-to-day environmental remediation activities?

A. The costs associated with short-term day-to-day operational environmental response include activities such as the Environmental Field Response team responding to minor workplace spills, transformer releases (often related to storm events), management of small quantities of contaminated soils that may be encountered during routine construction work, pipe-type-cable releases, releases from vehicle accidents, and releases that are caused by equipment failure (electric failure, corrosion, etc.), among others. CL&P has included $1.930 million of O&M costs in base rates for these types of activities. Further, environmental remediation associated with specific capital projects is included in capital project costs.

Q. Is CL&P requesting special recovery treatment for these day-to-day type costs?

A. No. Day-to-day operational environmental response is limited to small, repeatable types of events, and therefore including a representative amount of O&M expense in base rates is appropriate and consistent with the Company's last rate case. The Company proposes to incorporate $1.930 million for operational environmental response into base rates. Further environmental remediation associated with specific capital projects is limited to the scope of that given capital project and appropriately included within the cost of the capital project.

Q. Is there a type of environmental remediation work that is non-routine?

A. Yes, CL&P is also responsible for large, complex multi-year environmental response and remediation work at certain sites the Company has responsibility for pursuant to state and federal environmental laws. The Company has obligations to evaluate and address contamination, but for these sites the cost in meeting these obligations can be variable with costs significantly fluctuating year-to-year, which may result in a cumulatively large cleanup project. The type of sites falling into this category could be manufactured gas plants ("MGP") or historic company facilities where contamination occurred long before modern-day environmental laws and regulations.

Q. What are MGP sites and how did they originate?

A. From the early 1800s until the mid-1950s, MGPs were widely used for producing gas for use in lighting and heating. When interstate pipelines were constructed for natural gas transmission in the 1930s, MGPs shut down, as they could not compete with less

expensive natural gas delivered via pipeline. There were three types of gas manufacturing: (1) coal or coke oven gas; (2) oil gas; and (3) carbureted water gas.

The oldest and most common method of manufacturing gas, utilized in smaller communities, was to extract the gas that resulted from operating coal and coke ovens. These coal-gas plants consisted of large brick ovens called "retorts," which were partially filled with coal. As the ovens were heated, the coal was vaporized, resulting in manufactured gas. As the technology grew, coal-gas processes involved increasing temperatures, the addition of petroleum feed stock products and steam to enhance the quality of the coal-gas and increase the BTU content. The manufactured gas also included several purification processes to remove heavy hydrocarbons (including but not limited to tar), light hydrocarbons (such as condensate), and other impurities (such as sulfur and cyanide compounds).

The coal-gas production process involved the use, handling, and storage of large quantities (depending on size of the plant) of feedstock materials, such as coal, petroleum products, and the storage of by-products such as coal tar and gas purifying materials. Contamination from the residuals of these by-products are the primary sources or impacts investigated and/or remediated at MGP sites.

Q. Does CL&P have environmental remediation obligations for any MGP sites?

A. Yes. CL&P is responsible for a total of three legacy MGP sites throughout its service territory.[3] Each site requires investigation and some level of remediation to mitigate environmental risk and ensure compliance with federal and DEEP regulatory requirements. CL&P is responsible for these sites because they were acquired through predecessor companies.

Q. What are some of the environmental issues typically associated with these MGP sites?

A. The manufactured gasification process (which was the process of liberating gas from coal) resulted in the production of several byproducts.[4] CL&P's management and work activities on these sites are focused on the identification of the existence and extent of these contaminants, and the removal, remediation and/or containment of these residual materials.

Q. What are some of the environmental issues typically associated with other complex environmental remediation sites?

A. Similar to MGP sites, other complex environmental remediation sites often are associated with historic industrial use. For example, CL&P owns several former railroad right-of-ways due to their usefulness in serving as electric system corridors.

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[3] One site, Winsted MGP, is shared with Yankee Gas.

[4] These byproducts included, but were not limited to, tar (a viscous pitch-like material); hydrocarbon sludge; spent oxide waste (cyanide impregnated wood chips or resin); coke and ash; non-aqueous phase liquid, which can either be dense (which sinks) or light (which floats); distillate products (such as ammonia); and some light-end oils.

These former railroad corridors may be contaminated from the historic operation of a rail corridor. Other sites include current and former AWCs, substations, transformer locations and other sites where contaminants came to be located over time. Some locations may have had underground storage tanks that leaked, or may have served as waste disposal locations, or experienced releases of fluids containing polychlorinated biphenyls ("PCBs"). As with the MGPs, CL&P's management and work activities at these other locations are focused on the identification of the existence and extent of contaminants, and the removal, remediation and/or containment of these residual materials.

Q. How do you determine which contaminants need to be remediated?

A. All known contaminants located in soils, groundwater, surface water, and sediments (environmental "media") must be evaluated to determine the concentrations, volumes, and extent of impacts. The results are then compared to federal and Connecticut regulatory standards to determine the risks to the environment and human health. Based on the Company's analysis of the media, it is able to determine the level of remediation and post-remediation monitoring necessary to comply with federal and state requirements.

Q. Please provide additional information about the federal and state environmental requirements that apply to the investigation and remediation of contaminated sites.

A. There are several federal and state requirements that address contaminated site investigation and remediation. At the federal level, in 1980, Congress enacted the

Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), commonly known as "Superfund," which requires responsible entities to respond to actual or threatened releases of hazardous substances. Any potentially responsible party may be held liable for the cost of the investigation and remediation of a site. In Connecticut, the Release-Based Cleanup Regulations ("RBCRs") which took effect on March 1, 2026 (R.C.S.A. § 22a-134tt-1 et seq.), apply to the investigation, evaluation, and selection of remedial actions for impacted properties. The Remediation Standard Regulations ("RSRs") enacted in 1996 (updated in 2021) are incorporated into the RBCRs. The RSRs also include post-remediation actions (i.e., groundwater monitoring, soil vapor monitoring, engineered control/cap inspections and maintenance, etc.) that may be required.

Depending on the site and nature of impacts, additional statutory considerations could include: the Connecticut Transfer Act ("CTA") (Conn. Gen. Stat. § 22a-134 et seq.), the Significant Environmental Hazard ("SEH") Program (Conn. Gen. Stat. § 22a-6u), a Consent Order from DEEP, or the Voluntary Remediation Program (Conn. Gen. Stat. § 22a-133x).

Q. What types of environmental response activities may be required by federal and state requirements?

A. The sequence, timing, and magnitude of response activities can vary from site to site depending upon the size of the site, the degree of contamination, nearby sensitive receptors, land ownership, the degree of oversight and control exercised by regulators,

and many other site-specific factors. However, the typical sequence of environmental response activities is as follows:

- Phase I Environmental Site Assessment (desk top review along with site visits) which often results in the identification of areas of potential environmental concern;
- Phase II/III Site Investigation (including subsurface investigations to sample environmental media, conducting ecological risk evaluations, sensitive receptor evaluations, etc.);
- Remedial Action Plan ("RAP") Development/Technical Plans and Specifications (outlining remedial strategies to be implemented, conducting bench scale studies, computer modeling, etc.);
- Implementation of Remedial Action Plan; and
- Post-Remediation Monitoring (may include groundwater monitoring and periodic inspections and maintenance of an engineering control/cap).

Q. Is CL&P currently conducting or planning environmental response actions at any contaminated sites?

A. Yes. A table of the environmental sites and the Company's plans for investigation and remediation of these sites for 2026-2028 is provided as Exhibit CLP-ENV-5. Three of the sites are subject to the requirements of the Connecticut Transfer Act, and one of the sites is subject to the requirements of DEEP's Voluntary Remediation Program. Although most of these sites are not currently in a formal remediation program with DEEP, CL&P has made efforts to study and make further progress with the cleanup because it is consistent with the Company's environmental compliance sustainability goals and evolving DEEP cleanup regulations. These efforts are also consistent with Eversource's commitment to environmental stewardship, supporting the transition to

cleaner energy, and climate leadership as part of our everyday business.[5] Focused cleanup of contaminated sites, located in the heart of the communities we serve, is consistent with this corporate commitment and is a priority for the Company as a good steward of the environment.

Q. What has influenced the timelines for clean-up processes?

A. The Company has always complied with applicable requirements. As both the Company and its customers have become more environmentally conscious, CL&P has taken a more proactive approach and has worked closely with State and local officials to help ensure that site clean-up is appropriately timed with the objectives and needs of the areas in which these sites are located. Accordingly, CL&P is working towards cleaning up these sites, consistent with federal and state requirements, while also optimizing for other factors including the local impact that environmental remediation activities may relieve or impose. CL&P is also limited by the remediation process itself, which may involve implementing a specified remediation effort and then monitoring the site to determine the impact of that effort before taking further action. Long-term monitoring is often necessary and can result in additional remediation efforts after implementation of the RAP.

[5] Eversource's Sustainability Commitment outlines the Company's commitment to environmental accountability, stewardship, clean energy, and climate leadership as part of our everyday business. This is available at: https://www.eversource.com/docs/default-source/investors/sustainability-commitment.pdf .

CL&P actively considers the needs of the local and state governments in the timing and consideration of lower cost remediation efforts that remain protective of human health and the environment. One example is the partnership with the Town of Ridgefield where Eversource installed an engineered cap along an approximately two-mile former railroad bed that now serves as both an electrical transmission right-of-way and a public recreational trail. The cap was designed to prevent human exposure to historic contamination associated with prior railroad operations while also providing an open space for local residents. This remedial solution reduced the volume of contaminated soil that required remediation. When these opportunities arise to coordinate and work with local and state governments, CL&P seeks to do so as a benefit to customers via cost savings, and also to help improve communities through revitalization of underutilized properties.

Q. What types of costs does CL&P incur for environmental response in its complex environmental remediation activities?

A. The costs associated with complex environmental remediation are different in nature from day-to-day environmental response activities. These costs can vary greatly from site to site, based on the size of the site, the number and type of media impacted, the extent of the impacts, the volume of the waste, the sensitive receptors in the area, and the remedial action and length of monitoring necessary for the site. In general, for each site investigation, costs can be in the range of several hundred thousand dollars, and remediation costs can range into several millions of dollars. Again, the costs at each site can vary greatly and are affected by many factors. Further, new state and federal

requirements that may be promulgated from time to time could lead to additional investigation, remediation, monitoring, and post-remediation inspections and maintenance requirements at additional cost.

From 2017 to 2025, CL&P incurred a total of $14,469,838 in costs at its long-term environmental remediation sites (see Exhibit CLP-ENV-3). The Company has applied insurance proceeds received of $7,050,371 against the incurred costs resulting in CL&P's test year balance of $7,419,467. Including projected activity of $3.283 million and a proposed amortization period of four years, the Company has included an annual amortization expense in base rates in this proceeding of $2.676 million ([$7.419 million + $3.283 million] / 4 years = $2.676 million). See CLP-REVREQ-2, Schedule 3.36. PURA approved this special cost recovery treatment in the Company's last rate case.[6]

Going forward, CL&P requests that PURA continue to approve 100% deferral treatment for expenses for long-term environmental remediation sites.

The Company's incurred costs for 2017-2025 and the Company's proposal for rate treatment of future long-term environmental remediation costs are described more fully below in Sections III and IV.

[6] Appendix A of the Decision dated April 18, 2018, from Docket No. 17-10-46, Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend Rate Schedules.

III. HISTORIC COMPLEX ENVIRONMENTAL REMEDIATION EXPENSE

Q. How many sites required complex environmental remediation between 2017 and 2025?

A. Nineteen sites required complex environmental remediation activities between 2017 and 2025. Of the nineteen, three were MPG sites.

Q. Has CL&P completed the clean-up of any of these sites?

A. Yes, CL&P completed and closed out planned remediation activities at four complex sites between 2017 and 2025. The four sites include: Site #52 Former Substation Williams St 9L, Site #56 Historic Transformers (Capwell), Site #64 Property Transfer – Wethersfield, and Site #67 Madison AWC.

Q. Has the Company tracked the environmental remediation expense by site and by year?

A. Yes, please refer to Exhibit CLP-ENV-4 showing the total expense by year for 2017-2025 for each of the nineteen complex sites.

Q. Has the Company provided invoices for the historic environmental remediation expense?

A. Yes. The Company has provided a detailed master index with itemized cost detail for all complex environmental remediation activity since the Company's last rate case, which is presented in Exhibit CLP-ENV-3. For each invoice listed in Exhibit CLP-ENV-3, the index also provides the page number reference to the invoice copy provided in Exhibit CLP-ENV-3(A).

Q. Has the Company prudently incurred these environmental remediation expenses?

A. Yes. CL&P has been conducting its environmental response actions in compliance with state and federal regulations; in coordination with state and local governments; consistent with required schedules, where applicable; and with an aim to remediate at the lowest cost to customers. In particular, CL&P has been fully engaged with DEEP throughout the intervening years since the last rate case and actively works with DEEP when areas of concern are identified. As a result, the Company's costs are reasonable and incurred in good faith.

Q. What is CL&P's request for the 2017 to 2025 prudently incurred environmental remediation expenses?

A. CL&P incurred a total of $14,469,838 in costs at its long-term environmental remediation sites during these years. Historic insurance proceeds of $7,050,371 were used to against incurred costs. CL&P is requesting amortization of actual net environmental remediation expenses of $7.420 million and forecasted accruals through June 30, 2027 of $3.283 million over a 4-year amortization period for an annual amortization amount of $2.676 million. See CLP-REVREQ-2, Schedule 3.36.

Q. Please describe the status of each of the nineteen complex environmental remediation sites.

A. Each site and prior and remaining work is described here:

Site #5 Rockville Former Manufactured Gas Plant

Background: This former MGP operated from 1863 until gas production ceased in the mid 1930s. The site was acquired by CL&P in 1935 and converted to an electrical

substation, which remains the current use. The 3.43-acre site is generally surrounded by residential properties and a church, with the Hockanum River traversing the southern boundary.

Between 1989 and 1995, Northeast Utilities ("NU"), a predecessor to Eversource, conducted on- and off-site upland and river investigations and evaluated preliminary remedial options. In the third quarter of 2015, Eversource enrolled the site in CT DEEP's Voluntary Remediation Program.

Since the Last Rate Case: A Phase I Environmental Site Assessment ("ESA") was completed in 2017, followed by on- and off-site Phase II/III investigations. A SEH condition associated with surface soil was identified within the substation. Supplemental Phase III investigations (soil, groundwater, and sediment) were conducted between 2018 and 2020. In 2020, a soil vapor intrusion assessment was performed at the adjacent church property.

In 2021, additional supplemental Phase III investigations were completed, and quarterly groundwater monitoring was conducted to evaluate downgradient groundwater quality and seasonal variability. A Screening Level Ecological Risk Assessment ("SLERA") for the Hockanum River was submitted to DEEP. In 2022, quarterly non aqueous phase liquid ("NAPL") gauging and recovery was initiated, quarterly groundwater monitoring continued, and a soil vapor assessment of the substation control house identified no exposure concerns.

In 2023, a refined SLERA was completed and submitted to DEEP. The assessment concluded that surface water conditions adjacent to the site did not exceed ecological screening criteria and that sediment conditions were not statistically different from upstream background conditions. Therefore, no further ecological investigation or remedial action was warranted.

Between 2023 and 2026, NAPL gauging and recovery activities have continued. In 2025, test pitting and soil testing were performed as part of a treatability study to evaluate in-situ solidification/stabilization ("ISS") as a feasible remedial option for the below ground gas holders.

Annual SEH Soil Form Updates have been submitted to DEEP in May of each year since 2019, and annual reports have been submitted each December.

Several distribution, transmission, and gas related construction projects were completed at the site. All proposed disturbance areas were pre-characterized to support proper waste management and off-site disposal. Infrastructure improvements

completed between 2021 and 2022 included installation of duct banks, cable conduits, utility poles, and a transmission line structure. In 2023 and 2024, the on-site gas main was isolated and abandoned in place, and the gas regulator station was abated, demolished, and decommissioned.

In summary, the nature and extent of on- and off-site impacts have been extensively investigated and the project is likely to enter the remedial phase during the upcoming rate case period.

Remaining work: The current consultant is completing a comprehensive historical data review and data gap assessment. A limited supplemental surface soil investigation has been proposed. A further refined conceptual site model is planned. A Completion of Investigation Report is planned for submittal to DEEP (with potential off-site data gaps due to being denied access). The ISS Treatability Study Report is pending completion in 2026. Remedial alternatives will be evaluated. Alternative Surface Water Protection Criteria are being proposed to address the extent of the off-site dissolved phase plume. Once a remedial path forward is selected, a Remedial Action Plan and Construction Plans and Design Specifications will be developed. Ultimately, Environmental Use Restrictions will be implemented and the site will enter a post-remediation long-term groundwater compliance monitoring phase.

Site #8 Torrington Former MGP

Background: This former MGP operated at the site from 1899 until approximately 1947. NU inherited this site in 1966 when three other companies combined to form NU. Subsurface investigations began in the 1980s as part of the divestiture process. In addition, the property was utilized for electricity generation, and a substation was located on the northwestern portion of the site. A soil and groundwater investigation was completed in the spring of 1989. MGP tar, fuel oil, diesel, and gasoline constituents were identified at the site. A preliminary Phase II site investigation was conducted in 1993.

Since the Last Rate Case: Phase I (2020), II (2024), and III (2025) environmental site assessments have been completed at the site. Environmental impacts were identified in soils and groundwater beneath the site. The Phase III ESA report is currently being developed.

Remaining work: Next steps to advance the site to closure include a data gap assessment to evaluate any remaining data gaps (to be identified in the Phase III ESA report), preparation of a remedial action plan, completion of remedial activities to address identified impacts, post remedial groundwater monitoring, and final

verification. This site is currently enrolled in the Property Transfer Program due to a Form III filing in 1989.

Additional Information: The site is currently utilized as an Area Work Center and is very active. This is expected to cause challenges during remediation activities, due to daily traffic and activities occurring on site. Based on recent results, significant unexpected impacts are not expected to be identified during remediation.

Site #9 Winsted Fromer MGP (50:50 Cost Shared with Yankee Gas)

Background: Natural gas manufacturing occurred at the site from 1874 until approximately 1953. This site was first investigated in 1987-1988 as part of the Yankee Gas divestiture process. Several additional investigations were conducted at the site through the early 2000s. Notification to DEEP of a SEH related to elevated levels of Polycyclic Aromatic Hydrocarbons in surficial soils was made in 1999. Significant MGP impacts have been identified in the northern portion of the site. In addition to the MGP, portions of the site were used as an electrical substation and area work center. A 50:50 cost-sharing agreement was signed with Yankee Gas in 1993.

Since the Last Rate Case: Phase I (2022) and interim Phase II/III (2024) environmental site assessments and annual SEH reporting have been completed at the site. Aside from the SEH obligations, this site is not currently in a formal cleanup program with DEEP. The northern portion of the site is currently utilized for storage by CL&P and contractors. The southern portion of the site is occupied by a hardware store that leases out the former AWC building.

Remaining work: Next steps to advance the site to closure include off-site groundwater assessment to evaluate groundwater conditions prior to discharging to the Mad River, preparation of a remedial action plan, completion of remedial activities to address identified impacts, and post-remedial groundwater monitoring.

Additional Information: Groundwater samples at the downgradient property boundary indicate the potential for MGP related impacts to migrate off-site towards the Mad River. If off-site assessments indicate that MGP impacts are discharging into the MAD River above regulatory levels, additional assessment within the watercourse will be required (based on known information, the potential for impact to the Madd River is considered low). NAPL has been identified in the northern portion of the site. The extent of NAPL impacts is unknown and could result in significant challenges during remediation. Additionally, based on similar projects, NAPL waste generated during remediation may need to be treated as hazardous depending on analytical results.

Site #23 Ridgefield Right-of-Way

Background: The site consists of an approximately 2.3 mile former railroad right-of-way ("ROW") originally owned and operated by the New York, New Haven and Hartford Railroad Company. In 1965, the ROW was acquired by CL&P. In 1998, soil sampling (as part of the Rails-To-Trails construction) identified elevated concentrations of arsenic. Subsurface investigations completed in 1999 delineated arsenic impacted soil primarily within the upper two feet across a substantial portion of the ROW. A SEH was reported to DEEP in 1999. A proposed remedial approach, consisting of placement of an engineered cap and redevelopment as a rails to trails corridor, was submitted to the Town of Ridgefield and DEEP in the fourth quarter of 1999. Additional soil characterization was conducted to define cap limits, and an SEH Evaluation and Remedial Action Plan were submitted to DEEP in the second quarter of 2000. Following approval by the Connecticut Siting Council, construction commenced and remediation activities and trail construction were completed by the end of 2000.

Since the Last Rate Case: In accordance with the established Monitoring Plan, semi-annual inspections of trail surfaces, swales, culverts, and vegetation have been conducted from 2017 to the present. Periodic heavy rainfall events and high stormwater flows through the trail system, swales, and culverts have resulted in localized minor to significant damage that has required corrective maintenance since 2017. Beginning in 2019, inspection findings and any associated maintenance or repair activities have been documented in the annual SEH Soil Form Updates submitted to DEEP each May.

A substation is located at the western terminus of the trail. In 2025, a planned electrical distribution project involving installation of duct banks between the substation and the roadway required excavation beneath a portion of the trail. The engineered cap was re-established. Excavated soil was temporarily stockpiled, characterized for waste determination purposes, and transported to a permitted off site disposal facility in March 2026. Other substation construction projects were completed during this time; however, the work was limited to inside the substation fence line.

Remaining work: The SEH condition has been effectively mitigated and is currently controlled. Semiannual inspections will continue for as long as the engineered cap and Rails to Trails walking path remain in place to ensure continued protection against potential human exposure to arsenic impacted former railbed soils, or until the condition is permanently abated. In accordance with DEEP's RBCRs, this case will be entered into the DEEP REACT platform as a Significant Environmental Release ("SER") no later than March 1, 2028.

Additional Information: A recurring off-site condition associated with the Nutmeg Ridge Road stormwater drainage system continues to affect the downgradient trail area. Stormwater runoff has caused erosion of an adjacent private property slope and deposition of soil within the trail swale, resulting in concentrated stormwater flow, trail erosion, and further downgradient impacts to a private residence upstream of wetlands. Since 2019, Eversource has completed three engineered cap repair actions in this area. This condition has been communicated to the Town of Ridgefield on multiple occasions, and the Town and Highway Department are reportedly evaluating corrective measures. Based on the October 2025 inspection, no additional maintenance or repair was required at that time, however, soils are again being deposited in the swale. Future substation projects will include appropriate soil characterization and management of generated materials.

Site #27 Portland, CT ROW#2

Background: The site consists of an irregular shaped parcel of land totaling approximately 33.16 acres that was formerly owned by Penn Central Railroad used as a ROW. In 1972 the ROW was purchased by CL&P. In 1997 NU conducted surficial soil sampling along a section of the former railroad bed to determine if it was suitable for removal and re-sale of sand and gravel deposits. Elevated levels of arsenic were found on this section of the former railroad bed. Additional field testing and site evaluations were performed in 1998, 2005-2007, 2015, 2021, and 2023-2025 to further delineate the distribution of arsenic and other potential contaminants of concern in soil and groundwater at the site. Based on the results of investigations, impacted soil beneath the former railroad bed extends primarily to a depth of 2-3 feet below grade.

Remaining work: The site is fully characterized, and various remedial options have been presented. A remedial path has not been selected. From 2019-present, the Town of Portland has requested that Eversource allow extension of the Portland Airline Trail onto this property. Additionally, the current tenant (Butler Construction) and Eversource would like to develop a roadway on the former railroad bed for improved access to other areas of the site avoiding use of a roadway that abuts a YMCA recreational area. Allowing extension of the Airline Trail and construction of the roadway may trigger regulatory requirements that could impact remedial decisions and costs. Eversource is currently evaluating alternatives to close out the site, including options that may also include revised easements and potential divestiture of the property. In addition, discussions are ongoing with the town related to the trail extension.

Additional Information: The site is not in a regulatory program. Final decisions related to trail extension, easement modifications and/or divesture of the property will impact overall remedial strategies.

Site #52 Former Substations

Background: This project includes investigation and remediation work conducted at the following five substations: Kent 15N, Southington 4C, Washington 18E, Willard Ave. 21F, and Williams St 9L. The work on the Kent 15N, Southington 4C, Washington 18E, Willard Ave. 21F, sites was conducted before 2017.

A performance-based remediation of PCB impacts to soil was conducted within three excavation areas at the Williams St 9L substation in 2011. Due to the depth of PCB impacted soils and shallow groundwater table, this excavation was not able to achieve the desired remedial goal of less than one milligram per kilogram (<1 mg/kg) total PCBs for verification samples.

Since the Last Rate Case: Additional investigation activities were performed within the substation in October 2017 and April 2018 to further delineate residual PCB impacts and to prepare designs for future remedial actions. As part of an infrastructure reliability upgrade program, an emergency remediation plan was submitted to EPA on July 22, 2018 (subsequently amended via email on July 24, 2018). The goal of the remediation was to remove soil with PCB concentrations >1 mg/kg within the Equipment Upgrade Area. Because this work needed to be completed by September 2018 to coincide with scheduled electrical service interruptions, remediation of areas of previously identified impact could not be completed within this time frame. Removal of the remaining PCB-impacted area was subsequently completed between November 2018 and April 2019. Analytical results of confirmation soil samples indicated samples were <1 mg/kg total PCBs, indicating that the remedial goal for this cleanup was achieved within this area.

Site #55 Hunts Brook

Background: The site is an undeveloped, partially wooded and wetland parcel of land located at 128 Moxley Road in Montville, CT. From 1962 to 1968 it was used by the N.B. King Company as a landfill for coal ash from CL&P's former Montville Station. The approximately 14-acre site was subsequently purchased in 1969 by an adjoining private property owner. In response to a citizen complaint received in December 2005, the DEEP conducted a subsurface site investigation of the property. In 2006, CL&P acquired the property, and a Phase III Environmental Site Assessment was completed in 2007. Based on site investigation analytical data, a SEH notification (heavy metals in groundwater discharging to surface water and within 500 feet of a supply well) was submitted to DEEP in 2007. In 2015 the site was partially fenced with signage to limit public access.

Since the Last Rate Case: An additional SEH for arsenic contamination in the top two feet of soil has been reported; soil SEH delineation and partial abatement activities have been conducted; and additional site investigation activities including quarterly groundwater and surface water sampling have been conducted. Aside from the SEH obligations, this site is not currently in a formal cleanup program with DEEP.

Remaining work: Next steps to advance the site to closure include an assessment of remedial options and implementing pilot tests to evaluate the effectiveness of potential options, preparation and implementation of a remedial action plan, and post remedial groundwater monitoring.

Additional Information: Due to the complexity of the site location, in a residential area with private drinking water wells, wetlands and surface water surrounding the site on three sides, and impacted material below the water table, remedial activities may require significant coordination with DEEP, along with federal permitting. Additionally, impacts to the surface water bodies have been observed (in the form of metal precipitate). The extent of these impacts has not been evaluated and may require remediation.

Site #56 Historic Transformers (Capwell)

Background: This site was identified in Q1 2007 in response to a vandalized transformer located on private property where PCB impacted soils remain between the footings and beneath a building.

Work 2017 to 2025: This site has impacts to soil from a release from a transformer, impacting soil beneath a structure. Impacted soil was removed to the extent feasible. An agreement was entered into with the property owner to allow CL&P to construct an engineered control over the impacted soil and place an Environmental Use Restriction (EUR) on the property in January 2021. CL&P agreed to pay a fee of $46,000 to the owner of the property in this agreement.

Site #58 Enfield Area Work Center

Background: The site was used as an AWC by CL&P from 1944 to 1995. In 1997, the site was sold and a Form III was filed with DEEP identifying CL&P as the certifying party. Various subsurface assessments and remediation activities have been performed including remediation of a gasoline release in 1978 and 1989, gasoline and diesel underground storage tank ("UST") removal in 1993, a Phase III investigation in 2008, and soil excavation activities in 2009 and 2013 near a loading dock area. A groundwater air sparging and soil vapor extraction (SVE) remediation system was installed in 1990 and operated until 2003 in response to the gasoline release from the USTs located

southwest of the garage. While advancing test pits in 2012, utility poles, scrap metal, ceramic insulators, pipes, and wiring were observed in the subsurface. Groundwater has been monitored annually from 2013-2023.

Since the Last Rate Case: Groundwater monitoring has changed to bi-annually with recent sampling activities occurring in 2025. An evaluation of remedial options is currently underway.

Remaining work: Complete an evaluation of remedial alternatives and present alternatives to the current property owner, preparation of a remedial action plan, implementation of remedial activities, post-remedial groundwater monitoring, and final verification. As previously mentioned, the site is currently in the Property Transfer Program.

Additional Information: The site is no longer owned by CL&P. Therefore, selection and implementation of a remedial alternative will require coordination with the current property owner. As mentioned above, buried debris was identified in the subsurface during previous investigations. There is the potential for additional buried debris to be encountered during remedial excavation which would need to be managed if encountered.

Site #63 Berlin Settling Basin

Background: The Berlin Settling Basin is a stormwater settling basin on the Berlin, Connecticut CL&P Campus. PCB-impacted sediment/soil was identified during basin maintenance in 2011, prompting subsurface investigations of the basin, uplands, and adjacent unnamed stream (2011–2018) and a DEEP Consent Order (finalized December 2018).

Since the Last Rate Case: Remedial action was completed (May 2020–September 2021); post-remediation groundwater monitoring (August 2021–March 2023) confirmed groundwater is compliant; and an Environmental Land Use Restriction (ELUR) was recorded in 2025.

Remaining work: No additional remedial construction is anticipated. Rather, remaining work encompasses completion of ongoing ELUR compliance obligations, including annual inspections and a Licensed Environmental Professional ("LEP") inspection in 2030 and every five years thereafter, with required recordkeeping/reporting.

Additional Information: The site is closed and will undergo routine closure monitoring. Future repairs to capped areas may be required in the event of identified future erosion/cap damage.

Site #64 Property Transfer Wethersfield

Background: The site (176 Cumberland Avenue, Wethersfield, CT) was developed in the mid-1950s, primarily as a call/data center for CL&P. Other ancillary uses included vehicle maintenance and warehousing. CL&P sold and subsequently leased back the property beginning later in the 1950s. In 1998, Wethersfield LLC purchased the property and CL&P/NU continued as a tenant until 2006. During the period of CL&P's lease, environmental impacts occurred for which CL&P retained responsibility to investigate/cleanup as part of its lease agreement.

Wethersfield LLC subsequently sold the property to the Capitol Region Education Council ("CREC") in August 2012 and filed a Form III and Environmental Condition Assessment Form per DEEP Transfer Act requirements. Although Wethersfield LLC was the certifying party for the transfer, prior legal agreements between NU and Wethersfield LLC stipulated that NU would be responsible for completing the DEEP Verification (closure) process for the site.

The property underwent redevelopment into a CREC magnet school in 3Q 2015. Final site assessment work was completed in 2Q 2013, and remediation (excavation) of a limited impacted soil area was completed in 3Q 2013. Additional minor excavations of impacted soil have been conducted by the current property owner as part of on-going redevelopment. A Status Report was submitted to DEEP in 2Q 2015. Groundwater monitoring began in 3Q 2015.

Since the Last Rate Case: Annual groundwater monitoring events were completed in 2017, 2018, and 2019. In 2020 and 2021 groundwater monitoring was conducted on a quarterly basis to begin compliance monitoring. Two additional groundwater monitoring wells, required for verification, were re-installed in August 2018 after the original wells ran dry. In April 2022, the LEP for the site provided a letter indicating that the Areas of Concern identified at the time of the property sale have been appropriately investigated, remediated and post-remediation groundwater monitoring was performed for several years. While select metals and semi-volatile organic compounds persist at low levels in groundwater across the site, these contaminants were not the subject of the remedial actions conducted at the site in the area of the loading dock that Eversource is responsible for per the 2011 Settlement Agreement with the new property owner Wethersfield LLC. Following authorization from Legal, groundwater monitoring wells on-site were properly decommissioned, and the Final Annual Report was prepared and submitted in September 2022.

Site #66 East Hampton AWC, East Hampton, CT

Background: The site is an active CL&P AWC. In 1983 impacts to the on-site drinking water well and downgradient potable wells were identified associated with a release from historic gasoline regulated USTs previously located at the AWC. The release was assessed; drinking water replacement wells were installed on-site and for some downgradient property owners. Remediation, including soil vapor extraction and a groundwater pump and treat system, operated at the site for decades.

Since the Last Rate Case: The groundwater system was shut down in December 2021 due to reduced pumping rates and consistent groundwater monitoring results below permit limits. Rebound monitoring and additional investigation in the tank grave area was completed in 2022/2023. In 2024, site wide well survey and groundwater monitoring were performed, with impacts remaining in a few wells within the former tank grave. In addition, analytical data was collected to assess if active biodegradation is occurring in the overburden and bedrock wells. In 2026, a Certificate of Compliance for a historic 2012 SEH, associated with a hydraulic release which entered the groundwater treatment system, was received.

Remaining work: Remedial options are currently being assessed for the site. Since biodegradation was determined to be actively occurring on-site, a GroundWater Spatiotemporal Data Analysis Tool ("GWSDAT") analysis will be completed and, if favorable, will be presented to DEEP for concurrence that Monitoring Natural Attenuation ("MNA") would be a viable remedial option for this site. If the GWSDAT results are not favorable, then a bench scale test would be conducted to assess if in-situ chemical oxidation ("ISCO") treatment is a viable option. Given the downgradient receptors and groundwater divide, the bench scale test is needed to demonstrate that the remedial oxidant plume will not migrate off-site. If the bench scale test is successful and conditions appear suitable for ISCO treatment, a pilot test will be performed. The costs included in the three-year estimate includes funds for on-going maintenance, and disposal costs, as well as the installation of additional wells for the pilot test. It also includes the associated permitting, outreach, sampling and communications with regulators and abutters associated with performing the pilot test.

Additional Information: The site is not in a regulatory program, but consent orders associated with the historic UST release remain open. However, a request for Closure of the Consent Orders was previously submitted to DEEP back in 2019. Eversource will need to engage DEEP regarding the MNA and/or pilot testing for ISCO, including the likely collection of additional samples associated with accomplishing either remedy which will pull the site into the new RBCRs.

Site #67 Madison Area Work Center

Background: Madison AWC is located at 135 New Road, Madison, CT. This AWC serves as Eversource's staging area for service trucks and supplies for electric distribution in the area. Our records show a total of 11 USTs are documented for the site since 1973. Refueling operations at the site ceased in 1993 with the removal of the USTs. Based on the results of a soil gas survey and monitoring well sampling completed in 1989, an excavation was completed along the tank vent line for the 10,000-gallon UST designated Tank 5E. During the excavation, there was evidence of leakage from the vent line. Excavation along the end of the tank showed contamination around and under the tank. On August 31, 1989, the tank and surrounding soil were removed. There was evidence of gasoline-contaminated soil around the fill, suction, and vent lines. The site is subject to Connecticut's UST regulations, R.C.S.A. § 22a-449(d)-1 et seq. Multiple groundwater monitoring and recovery wells were installed in December 1990. Approximately, 3 to 4 inches of light non-aqueous phase liquid was found in monitoring well MW 1 in November 1991. A groundwater recovery and treatment system was installed and operated from 1991 to 2020. From 1992 to 1998 a portable air sparging system (moved well to well) was operated to reduce dissolved-phase impacts in monitoring wells outside the recovery well network.

Since the Last Rate Case: Fourteen soil borings were completed at the site in August 2019. The subsurface investigation indicated impacted soils are concentrated at and immediately downgradient of the former UST locations. July 2019 groundwater quality data indicated VOC impacts in limited areas. In 2021 the following investigation was conducted: a potable well survey; a slug test; soil boring/sampling; an ambient groundwater flow evaluation; and bedrock well installation and sampling. To fully delineate the gasoline release area and to facilitate a plan for proposed remedial excavation activities, 15 soil borings were advanced at the site between September 27 and December 3, 2021. The results of this investigation indicated that the release area, associated with the former gasoline USTs, was fully delineated. A September 2022 Remedial Action Plan indicated that excavation of the impacted soil would be the most cost-effective option. Bid specification packages and request for bids were sent out to remediation contractors in January 2023. A December 6, 2023 Remedial Action Report describes the remediation activities that occurred in 2023 in the area of the former UST grave. Excavation of VOC impacted soil was conducted between June 27 and September 22, 2023. Due to heavy traffic at the AWC, the excavation was conducted in stages. A total of 4,679 tons of gasoline-impacted soil was transported to a permitted disposal facility. Confirmation soil sampling was conducted at the side walls and base of the excavation to confirm that impacted soil was removed. Dewatering of the excavation occurred after a storm event. 143,000 gallons of stormwater was recovered from the excavation and transported to a permitted disposal facility. The excavations were backfilled, compacted and paved. Two of the monitoring wells that were destroyed during the excavation activities were replaced in December 2023. Post-remedial monitoring consisting of quarterly groundwater sampling events was completed between January and October of 2024. A Leaking Underground Storage

Tank Closure Report was prepared and submitted to DEEP on March 14, 2025. Decommissioning of the monitoring well network, consisting of 21 wells, was completed by a Connecticut-licensed driller in September 2025. A request for closure of LUST ID #31668 was submitted to DEEP on March 14, 2025.

Site #68 Simsbury Area Work Center

Background: The site encompasses 60 acres. The central portion of the site (approximately 20 acres) was formerly an AWC. It was used primarily for office and warehouse space, outdoor storage of a variety of electrical equipment and utility poles, vehicle maintenance and fueling, and transformer maintenance. CL&P (and its predecessors) owned the site from the late 1950s until 2002 and continued to lease the site until 2016. At the time of the property transfer, it was determined that the site met the definition of an "Establishment" under the Property Transfer Act and CL&P was identified as the Certifying Party on a Form III filing. Environmental assessments conducted prior to and following the sale of the property documented ten Areas of Potential Environmental Concern ("AOPECs"). A groundwater pump and treat recovery system, associated with a release from a gasoline UST, was installed in 1990 and operated until 2003 when it was determined that additional groundwater recovery was no longer warranted.

Since the Last Rate Case: Additional investigation activities were conducted in 2019 to delineate soil impacts and groundwater monitoring has continued annually. An updated conceptual site model is currently being developed to identify AOPECs that can either be closed or will require additional assessment.

Remaining work: Next steps to advance the site to closure include completion of the updated conceptual site model and evaluation of remaining data gaps, interim closer of AOPECs already remediated, development of a remedial action plan for remaining AOPECs, implementation of remedial activities, post remedial groundwater monitoring, and final site verification.

Additional Information: The site is no longer owned by CL&P. Therefore, selection and implementation of remedial alternatives will require coordination with the current property owner and lessee. While significant investigation activities have occurred previously, records indicate that at least 16 underground storage tanks were used at the site. There is potential for impacts from these, or other undocumented storage tanks, to be identified during future remedial activities. Additionally, the property was utilized as farmland from approximately 1926 to 1958. There is potential for the identification of previously unknown debris during remedial excavations.

Site # 103 27 Parsons Lane Durham Mineral Oil Dielectric Fluid Release

Background: On October 19, 2018, CL&P responded to a release of mineral oil dielectric fluid ("MODF") containing PCBs at 27 Parsons Lane, Durham, Connecticut. The incident occurred when a utility pole supporting three customer-owned, pole-mounted transformers failed and fell onto the roof of an industrial/commercial building. The impact punctured the roof, causing one transformer to release the majority of its oil into a restroom/utility room within the building. The released MODF impacted the concrete floor, roof materials, and the exterior surfaces of four well-water pressure tanks.

The MODF migrated into three floor drains in the restroom/utility room. Two drains discharged to an outdoor catch basin located in a grassy courtyard area, which conveyed flow via an outlet pipe to a discharge channel connected to an intermittent stream at the northwestern corner of the property. The third drain discharged into the building's active septic system. Following the incident, the property owner's contractor relocated the three transformers to the ground outside the building. Subsequently, the primary bushings were removed from the two undamaged transformers, reportedly due to vandalism, resulting in the release of their oil contents onto the courtyard lawn and into the same catch basin discharging to the intermittent stream.

Eversource retained a remedial contractor to conduct initial response and remedial activities. These actions included removal and off-site storage of the three transformers; removal of impacted roofing materials; decontamination of concrete floor surfaces, well-water pressure tanks, and restroom floor drains; placement of absorbent booms in the intermittent stream; and excavation of impacted soil in the courtyard area. Environmental samples from multiple media were collected for characterization. Analysis of transformer oil indicated total PCB concentrations greater than 50 parts per million (ppm), thereby subjecting the release to regulation under US EPA's Toxic Substances Control Act ("TSCA"). A TSCA Performance-Based PCB Cleanup, in accordance with 40 CFR §761.61(b), was completed in the courtyard area. An environmental consultant was retained to perform follow-up testing and to manage the project. Waste was containerized and transported to permitted off-site disposal facilities. An Interim Remedial Action Report documenting these activities was submitted to DEEP in May 2019.

In November 2019, an Ecological Risk Assessment Work Plan was submitted to DEEP. Natural Diversity Database ("NDDB") review requests were submitted in July 2019 and March 2020, with determinations issued by DEEP. Supplemental sediment sampling was performed in March 2021, and a SLERA was submitted to DEEP in December 2021. Additional NDDB review requests were submitted in February and April 2023, and determinations were received.

In March 2024, a Remedial Action Plan was submitted to DEEP to address stream sediment hot spots identified in the SLERA and to decommission the restroom floor drains. In July 2024, construction plans and technical specifications were prepared, and a remedial contractor was selected. A Self Verification Notification was submitted to the U.S. Army Corps of Engineers in August 2024. An Inland Wetlands and Watercourses Permit Application was submitted in August 2024 and approved by the local commission following a public meeting in September 2024. RAP implementation was completed in October and November 2024. PCB remediation waste was transported to a permitted off-site disposal facility in December 2024.

In February 2025, the Final Remedial Action Report was submitted to DEEP. The report summarized response activities conducted between 2020 and 2024 and concluded that, based on cumulative remedial actions, no further investigation or remediation was warranted.

Due to multiple responsible parties being identified related to ownership of the transformers by the property owner and contractors retained by the owner, Eversource entered into settlement discussions to pursue cost recovery. The settlement proceedings have been concluded which resulted in the collection of proceeds to offset Eversource's response costs.

Remaining Work: On February 19, 2026, the DEEP PCB Program Coordinator acknowledged review of the Final Remedial Action Report and confirmed that remedial activities were conducted pursuant to 40 C.F.R. § 761.61(b), with cleanup objectives established by DEEP's Water Quality Group due to the sensitivity of the affected stream. The PCB Program Coordinator indicated no additional comments and recommended that Eversource also obtain feedback from the US EPA and DEEP's Water Quality Group. Eversource's project team meet with DEEP's Water Quality Group on April 28, 2026, and a meeting with EPA is currently being planned.

Additional Information: Eversource's environmental consultants have recommended case closure to DEEP. The spill case remains open until feedback is received from DEEP's Water Quality Group and EPA Region 1.

Site #117 Berlin Campus

Background: There are two releases at the Berlin campus located at 107 Selden Street: (1) a historical release from a leaking gasoline UST, and (2) a release associated with water from an air handling unit into the tank containment area of the Central Maintenance Service ("CMS") Building, Tank Room C, where subsequent sampling identified PCBs at concentrations greater than 50 ppm in the concrete containment floor from historical operations.

With respect to the historical UST release, NU submitted an Initial Abatement Measures (20 Day) Report to CT DEP in August 1997 for a release from the formerly abandoned J11 gasoline UST located outside the CMS Building. The concrete filled UST and approximately 135 cubic yards of impacted soil were removed and disposed of at a permitted off-site facility. While soil impacts were limited to the immediate vicinity of the former tank, dissolved phase groundwater impacts extended downgradient. Additional soil borings and monitoring wells were installed to define the extent of impacts and support remedial system design. A soil vapor extraction ("SVE") system was installed in fall 2004 and operated for approximately 20 years.

Since the Last Rate Case: To evaluate site conditions and progress the case toward closure, a consultant was retained in 2022–2023 to conduct a historical records review, SVE system performance evaluation, preliminary findings and opinion report, and supplemental site characterization, including soil borings, monitoring well installation, and soil and groundwater sampling. Based on the findings, the SVE system was shut down in 2024, and the shed and above ground components were demolished and properly disposed of off site in 2025. A Release Investigation Report was submitted to DEEP in August 2025, concluding that groundwater contaminant concentrations are decreasing and that the plume is in a diminishing state. A post remedial groundwater monitoring program consisting of quarterly sampling was initiated in the fourth quarter of 2025.

Regarding the CMS Building Tank Room C release, water from a ceiling mounted air handling unit entered the tank containment area, prompting sampling that identified PCBs greater than 50 ppm in the concrete containment flooring from historical operations. The release was reported to DEEP, and Spill Case No. 2021 02647 was assigned. The PCB source has been addressed, as tanks in this area no longer contain PCBs at or above 50 ppm and currently store non PCB oil and processed oil drained from non PCB equipment. At the request of DEEP, a Work Plan to encapsulate the containment area concrete floor was submitted to and approved by U.S. EPA Region 1. In December 2024, the concrete containment floor was cleaned and encapsulated in accordance with the approved Work Plan.

Remaining Work: Two quarters of post remediation groundwater monitoring were completed in the fourth quarter of 2025 and the first quarter of 2026. In 2026, the gasoline UST release case will be entered into DEEP's REACT platform and tiered. Quarterly groundwater monitoring will continue. At this time, there is insufficient data to determine whether monitored natural attenuation will serve as the final remedial approach.

In accordance with the approved Work Plan, an Annual Inspection, Maintenance, and Monitoring ("IMM") program has been implemented for the encapsulated concrete

floor in Tank Room C. Based on current observations, the encapsulated area remains in compliance. The Annual IMM program will continue.

Additional Information: Post remediation groundwater monitoring results will be reviewed quarterly to evaluate concentration trends. If groundwater contaminant concentrations do not demonstrate a decreasing trend, alternative in situ remedial options will be evaluated. If damage to the encapsulated area is observed, surface repairs will be implemented. Absent any deterioration, the Annual IMM program will continue until the tank storage and containment area is no longer in use.

Site #118 2 Main Street Enfield CT

Background: The Site is identified by the Town of Enfield as parcel 8-27 located on Main Street and is internally identified as 2 Main Street. This site was historically occupied by an approximately 9,000 square foot former electric power generation facility from approximately 1953 until 1982. In 2018 TRC Environmental Corporation ("TRC") was retained by the Town of Enfield to perform a hazardous building material ("HBM") survey and concrete/equipment oil sampling in the building as part of an environmental due diligence assessment of multiple parcels. The Town was considering purchasing the property as part of a transit project. Results of the HBM survey indicated that asbestos containing material ("ACM"), lead-based paint, and low levels of PCBs in concrete were detected in building materials. The generating facility building remains in place and is currently vacant. Eversource has documented numerous break-ins which have resulted in vandalism and safety concerns associated with the building. Eversource engaged GEI Consultants Inc. to provide costs for abatement and demolition of the structure due to the safety concerns. GEI Consultants Inc. completed an updated HBM survey in June 2024 to supplement the previous survey completed by TRC in 2018. Results of the supplemental HBM survey indicated the presence of additional hazardous building materials including additional ACM, PCBs (in mastic, window glazing, caulking and paint coating on the concrete floor), and petroleum impacted concrete floors that were previously not identified.

Remaining work: Work is currently on hold due to the potential sale of this property and 4 other adjacent and nearby parcels (Purchase and Sale Agreement was executed on 11/3/2025).

Additional Information: The sale of this property could potentially alleviate Eversource environmental liability. If the sale of this property is not executed, then Eversource will continue with abatement and demolition of the site structures. Additionally, new regulations effective on 3/1/2026 could potentially trigger other regulatory requirements for site cleanup if Eversource were to remain the property owner.

Site #119 Windsor Operations Center

Background: The site was purchased by CL&P in 2021. During the property transaction, it was determined that the site met the definition of an "Establishment" under the Property Transfer Act. A Form III identifying Rocky River Realty Company (on behalf of CL&P) as the Certifying Party was submitted to DEEP. A Phase I and Limited Phase II ESA were completed prior to acquisition of the site. We agreed to be the Certifying Party because the due diligence information that we had, at the time of the purchase, indicated that the cost to remediate would be relatively low. As part of the Transfer Act requirements, additional investigation activities were completed in 2023 to delineate and expand on the Limited Phase II ESA. Based on results of the additional investigation, remediation was required. In 2025, a remedial action plan was developed for the site and remedial activities were initiated. During remedial excavation activities, concrete foundation remnants from a former boiler room associated with historic structures on the site were identified. Concrete samples were collected from the foundation to determine if excavation and disposal were required. The analytical results indicated the detection of PCBs >50 parts per million. The concrete foundation and soil immediately adjacent and on top of the concrete was managed as PCB remediation waste in accordance with US EPA TSCA regulations. During Subpart O verification sampling, PCB concentrations above the SEH threshold were detected in surficial sidewall samples at the southern edge of the excavation. Characterization sampling was conducted to determine the extent of the PCB impacts outside of the initial excavation.

Remaining work: Remedial activities are ongoing and additional soil excavation of PCB remediation waste has occurred. Subpart O verification sampling is currently underway for the additional excavation area to determine if further excavation is required. Once the PCB remediation waste is confirmed (through analytical results) to have been removed, the area will be backfilled and post remedial groundwater sampling will commence followed by final verification.

Additional Information: Additional removal of PCB remediation waste may be required pending Subpart O verification sampling. Other areas of environmental concern have been adequately addressed.

Site #121 Bartholomew 18, Bartholomew Avenue Hartford, CT

Background: The site is an approximately 0.4-acre former substation property located at the southern end of Bartholomew Avenue in Hartford. Around 1939, an approximately 5,000 square foot three-story brick substation building with an adjacent transformer area was constructed in the northern portion of the site. It is unknown when the station stopped operating, and the majority of the property is not currently

used by Eversource except for two large active padmount transformers located on the western side of the building, within the station fence. In September 2025, Eversource received an Opinion of Probable Costs ("OPC") from Zuvic Inc. for assessment and removal of substation infrastructure due to safety concerns related to multiple break-ins and a fire being set inside the building and the hazards previously identified within the building.

Remaining work: Station equipment located within the building remains to be removed before pre-demolition Hazardous Building Materials Assessments (HBMA) work can commence. We anticipated conducting this work in 2026. Subsequently Phase I-II ESA activities in the station yard will be performed, followed by Phase III to delineate impacts identified.

Additional Information: The identification of a Significant Environmental Release (SER) under the new RBCRs requiring Immediate Action could accelerate the timeline for completion and increase costs as these impacts will need to be delineated, reported and remediated immediately.

IV. FUTURE COMPLEX ENVIRONMENTAL REMEDIATION EXPENSE

Q. Has CL&P identified the sites that will undergo investigation and/or remediation in 2026 and beyond?

A. Yes. As discussed in the site-by-site summary above, there are fifteen sites with remaining work to be completed in 2026, into the Rate Year in 2027, and beyond. CL&P's current plan for complex environmental remediation activities during the next three years is provided in Exhibit CLP-ENV-5. Because of the nature of these sites, there are variables not under CL&P's control that can limit the progress of complex remediation activities, including but not limited to, coordination with local and state governments, new regulatory requirements, the results of investigations, supplemental investigations, and monitoring, access agreements for abutting property owners, regulatory permits, regulatory approvals, and site infrastructure. For example, DEEP's recent adoption of Released Based Cleanup Regulations make the handling and

delineating of soil more complicated, time consuming, and costly in the future, and therefore CL&P has worked with DEEP and plans to continue to coordinate with DEEP regarding appropriate approaches. Thus, while Exhibit CLP-ENV-5 attempts to provide a projection of planned activities at each site, actual progress in a given year can be highly variable.

Q. Has CL&P developed a projection of costs that it will incur in relation to activities at the fifteen complex environmental remediation sites?

A. Yes. In 2026, the Company expects to incur approximately $3.35 million for complex environmental remediation activities. For 2027 and 2028, respectively, the Company expects to incur approximately $2.01 million and $1.21 million in costs.

Q. How has CL&P accounted for its future complex environmental remediation costs in its revenue requirement?

A. CL&P is proposing to continue to defer 100% of the costs for complex environmental remediation, with carrying charges at the Company's authorized Weighted Average Cost of Capital, subject to a prudence review and amortization in the Company's next base distribution rate case.

V. GREENHOUSE GAS EMISSION SCORECARD METRIC

Q. What is the metric the Company is proposing related to GHG emission reductions?

A. Eversource Energy is committed to upholding responsible business practices and delivering safe, reliable and affordable energy to our customers while advancing the transition to a clean energy future. This vision underpins the Company's sustainability

program that is embedded throughout the entire organization. One of the central focus areas for Eversource Energy's sustainability program is climate leadership, which includes dedicated efforts to reduce emissions through both near- and long-term goals. To complement this enterprise-wide emission reduction effort, the Company is proposing as part of the PBMRP a multi-prong GHG Emission Scorecard Metric that includes reporting annually: (1) total Scope 1 Emissions; (2) total Scope 2 Emissions; (3) total Scope 3 Emissions; (4) Residential Delivered Electric Energy Intensity; (5) Commercial Delivered Electric Energy Intensity; (6) Residential Emissions Intensity from Delivered Electricity; and (7) Commercial Emissions Intensity from Delivered Electricity. The GHG Emission Scorecard Metric represents a comprehensive suite of data to assess the Company and its customers' progress toward reducing GHG emissions.

Q. Please describe how the Company proposes to measure Scope 1, 2, and 3 emissions.

A. Eversource Energy maintains a GHG inventory following the guidance of the GHG Protocol Corporate Standard[7] and undergoes third party verification. The annual data is published as part of the Company's annual Sustainability Report. Consistent with the GHG Protocol Corporate Standard, Eversource reports:

- **Scope 1**: Direct emissions from sources that are fully owned and controlled by the Company such as the combustion of fuels or direct releases of GHGs in the form of fugitive emissions.

[7] A Corporate Accounting and Reporting Standard, Revised Edition, *available at*: https://ghgprotocol.org/corporate-standard.

- **Scope 2**: Indirect emissions primarily associated with consumed electricity and energy lost in the transmission and distribution system ("line loss").[8]

- **Scope 3**: All other relevant indirect emissions not covered in Scope 2 that reflect activities across the Company's value chain. For Eversource, the most significant sources of these emissions are associated with the use of energy delivered to customers.

To date, emission reporting is performed at the enterprise-wide level (i.e., Eversource Energy) and not by operating company (i.e., CL&P). The Company, however, has been working toward preparing data so that it may be reported at the operating company level and intends to make this additional level of detail available no later than the 2027 calendar year, to be reported in 2028. At that time, the Company will be able to track and report emissions specifically for CL&P.

Q. Please describe how the Company proposes to measure energy and emission intensity for residential and commercial sectors.

A. Customer energy intensity is calculated using simple ratios for kWh sales per customer and number of customer accounts by class. The associated emissions intensity is calculated by multiplying the energy use for each customer class by the most recent emissions factors available through Green-e[9] and normalizing by the corresponding number of customer accounts.

[8] World Resources Institute, GHG Protocol Scope 2 Guidance, *available at:* https://ghgprotocol.org/sites/default/files/2023-03/Scope%202%20Guidance.pdf

[9] In accordance with the GHG Protocol Scope 2 Guidance, a market-based approach to calculating emission is used by applying emissions factors associated with contractual renewable energy instruments, that are available through the independent and widely adopted Green-e data set.

Q. Is the Company proposing a baseline and targets for the GHG Emission Scorecard Metric?

A. No. As discussed above, the Company does not currently track Scope 1, 2, and 3 emissions at the operating company level but is actively working towards being able to report this data for CL&P starting with calendar year 2027, to be reported in 2028. The Company recommends using five years of data to establish a baseline. Accordingly, the Company intends to continue reporting enterprise-wide Scope 1, 2, and 3 data annually under the proposed Performance Based Ratemaking Framework. Starting in 2028 for calendar year 2027 performance, the Company will be able to report CL&P specific GHG data which may form the basis for considering metrics in future PBR terms.

Since GHG emissions related to electric distribution service are driven primarily by generation fuel mix and customer usage, the Company does not have direct control to reduce these GHG emissions. The Company does try to encourage reductions in energy consumption through energy efficiency programs and supporting the interconnection of renewable energy to the grid, which helps reduce the carbon intensity of the regional grid. In addition to these efforts influencing the largest portion of the Company's GHG footprint, Scope 3 emissions from customers' energy use, Eversource Energy also seeks opportunities to improve efficiencies and reduce emissions within its operational footprint. For CL&P operations, this includes efforts such as energy-saving improvements at facilities, enhancing efficiency of the fleet through driver behavior and procurement of lower-emitting vehicles and equipment, and reducing releases of

sulfur hexafluoride (SF_6) through maintenance of leak-prone equipment and piloting SF_6-alternative switch gear. As the Company strives to demonstrate climate leadership, it will remain focused on areas with the greatest influence of control while supporting state climate policies related to preparing the grid for a clean energy transition. Therefore, the Company recommends reporting on GHG Emission metrics to provide transparency rather than establishing specific CL&P targets.

Q. Is the proposed GHG Emission Scorecard Metric consistent with PURA's Proposed Final Decision related PBR metrics in Docket No. 21-05-15RE02?

A. Yes. In its Proposed Final Decision, PURA agreed that GHG emissions and energy and emission intensity should appropriately be reported as scorecard metrics (Docket No. 21-05-15RE02, Proposed Final Decision at 48-50). The Company proposes to report in alignment with PURA's Revised Straw Proposal; however, instead of reporting enterprise-wide emission data, the Company will report operating company specific data once it is capable of doing so.

VI. CONCLUSION

Q. Do you have any concluding remarks?

A. Eversource Energy is committed to acting responsibly in its operations and strategic outlook that supports its customers, communities and local environment well into the future. The Company's sustainability program represents this commitment and how we integrate related initiatives across the organization. This includes efforts that contribute to Connecticut's climate targets and executing environmental stewardship through

CL&P's approach to managing, investigating, and remediating environmental sites in compliance with federal and state requirements. The Company is driven by the need to serve its customers in a safe and reliable manner while maintaining compliance with federal and DEEP regulatory requirements. CL&P continues to incur environmental response costs associated with environmental remediation sites in a reasonable and good-faith manner. The Company requests that PURA continue to allow it to defer costs for complex environmental remediation activities consistent with the cost recovery treatment previously authorized for other utilities.

Q. Does this conclude your testimony?

A. Yes, it does.