GenConn Energy LLC **Witness: Devang Patel**
April Theberge

Docket No. 26-06-02

Date Submitted: October 1, 2026

RRU-032 Q:

(THIRTY-YEAR LIFE BASIS) Application, Att. GenConn-11, Note and retirement rows; 2026 AFRR Decision Hr'g Tr., pp. 60-62; Att. GenConn-EP1, pp. 28, 58 and 101; Att. GenConn-EP5, pp. 19-24. Regarding the Company's application of thirty-year economic life:

a. Identify and provide copies of every depreciation study, service life study, net salvage study, engineering life assessment or condition assessment of either facility performed since 2008 by the Company, any owner, affiliate, lender or consultant. Additionally, state every basis, separate from the CfD term, on which thirty years represents the economic life of the facilities.
b. State whether the Company agrees that its retirement history is insufficient to support a statistical analysis of service lives, state the basis for its answer, and reconcile its answer with the seventeen retirement rows reported in Attachment GenConn-11.
c. State whether the Company agrees that the economic life of the facilities and the term of the CfD are the same period as a matter of fact, or only that the CfD term limits the period of cost recovery.

RRU-032 A:

Please refer to the Company's response to Interrogatory RRU-31, which describes the unique aspects of the GenConn facilities and their reliance upon the Contract for Differences ("CfD").

a. There has been no depreciation study, service life study, net salvage study, engineering life assessment or condition assessment of either facility performed since 2008 by the Company, any owner, affiliate, lender or consultant. The basis for economic life is and has always been 30 years, consistent with the Final Decision issued in Docket No. 07-08-24, DPUC Investigation of the Process and Criteria for use in Implementing Section 50 of Public Act 07-242- Peaking Generation (the "Criteria Decision") at 29, PURA required the use of a 30-year straight line depreciation and PURA's review and approval in each AFRR filing to date.

b. GenConn's retirement history is consistent with the established 30-year economic life of each plant as outlined in the Company's response to Interrogatory RRU-031 and consistent with the Criteria Decision as noted in response to subpart (a). The Company's position, therefore, is that a statistical analysis of service lives is irrelevant to the GenConn facilities which legal rights to operate are governed by the CfD with a definitive term. The retirements as presented in Attachment GenConn-011 correspond to only those plant additions and the consequential related retirements necessary to maintain the useful life of

the overall facilities and meet the operating obligations under the CfD. Please note Attachment GenConn-011 is an illustrative example and includes plant additions that are depreciated over the balance of the 30-year term of the CfD and associated retirements. Attachment GenConn-11 also presents those values as of December 31, 2025.

c. PURA required a CfD term of 30 years and required the use of 30-year straight line depreciation. The combination of these requirements and PURA's annual review of AFRR requests support the conclusion that cost recovery coincides with the CfD contract term. While the CfD contains provisions that provide an opportunity to extend the term, there was no contemplation that an extension would occur and as outlined in the Company's response to Interrogatory RRU-031, GenConn has operated and accounted for the facilities from the date of commercial operations under the assumption that the facilities will cease operation and be dismantled at the end of the 30-year term of the CfD consistent with GenConn's legal rights to operate the facilities and the land leases. In this case the facilities' economic life defined as the period over which the facilities are beneficial to operate and the CfD are aligned because the legal right to operate the facilitates and generate cash flows are limited by the term of the CfD. Both GenConn Plants began commercial operations and its participation in the ISO-NE markets in May 2010 and May 2011 respectively. The CfD term initiated in the following month of June 1, 2010, and June 2011 respectively.