STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE: GB II LLC APPLICATION	**:**	**DOCKET NO. 26-06-03**
TO ESTABLISH 2027 REVENUE	**:**	
REQUIREMENTS	**:**	**SEPTEMBER 2, 2026**

THE OFFICE OF CONSUMER COUNSEL'S SECOND SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from GB II New Haven, LLC ("GB II") to the following interrogatories in the above-captioned proceeding by **September 16, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

1. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

2. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

3. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

4. Provide English translations of all responsive documents that exist in a language other than English.

5. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision is adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-24 through OCC-33 are directed to GB II.

OCC-24: According to the information provided in Exhibit OCC-12, at page 3, GB II is required to obtain three sealed bids through a request for proposals ("RFP") for a project of this size. Exhibit OCC-12 further indicates that GB II is required to complete an evaluation template for the bids and an award memorandum after selecting the winning bid. Please provide copies of: (1) all bids solicited or received by GB II in connection with the transformer project; (2) the completed bid evaluation template; and (3) the completed award memorandum.

OCC-25: Please provide a table identifying every project for which GB II has contracted with Rizzo Electric during the past ten years. For each project, please provide the following information:

a. The date the contract was awarded;
b. The date the project was completed, if applicable;
c. The total contract amount;
d. A description of the project;
e. Whether GB II solicited bids from other contractors for the project (Yes/No); and
f. If other bids were solicited, whether Rizzo Electric submitted the lowest-cost bid (Yes/No).

OCC-26: Referring to OCC-13 Interrogatory, OCC-17 Interrogatory, and OCC-17 Interrogatory Response. Why is the Company stating Rizzo Electric's cost as $424,000 if the procurement price is $865,000?

OCC-27: Referring to OCC-15 Interrogatory Response and Docket #25-06-03 Interrogatory Response Exhibit OCC-2 spreadsheet: How did Rizzo Electric submit the most competitive unit pricing among the disclosed options in the prior case if Rizzo Electric is the highest cost?

OCC-28: Referring to OCC-19 Interrogatory Response, Docket #25-06-03 Time Schedule, and Docket 25-06-03 Transcript. Why was Rizzo Electric not discussed in the Docket 25-06-03 Hearing that occurred on October 30, 2025, if the Company was already in discussions with them? OCC asked on page 49 of the transcript what is the difference between the **five companie**s the Company **can contract** with to get the new transformer.

OCC-29: Referring to OCC-19 Interrogatory Response and OCC-20 Interrogatory Response. If Rizzo Electric has supported the New Haven site for 20 years, recently played a critical role in removing and installing several large 4160V motors, and overall is a critical partner supporting all phases of work than why was it not considered during planning for a New Transformer and not included in the New Transformer Replacement Plan?

OCC-30: Referring to OCC-20 Interrogatory Response. When did Rizzo Electric remove and install several large 4160V motors? Please provide Rizzo Electric's bid and all other bid for that project.

OCC-31: Docket 25-06-03 Transcript, page 58. Is it correct that the Company has never run economically on natural gas?

OCC-32: Is it correct that the Company has only used the natural gas as a fuel source during testing?

OCC-33: Why should ratepayers pay for the most expensive, longest lead time transformer for a fuel source the Company has never run on?

Respectfully submitted,

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Julie Lelek
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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 2nd day of September 2026.

/s/Julie Lelek
Commissioner of the Superior Court