CAE-031

The United Illuminating Company **Witness: Robert Whelan**
Logan Taricani

Docket No. 26-08-05 **Page 1 of 1**

Date Submitted: August 28, 2026

CAE-031 Q:

Eversource Comments, July 9, 2026, p. 6, fn. 10. Explain whether retail transactions involving standalone FTM storage resources would have any implications under the Public Utility Holding Company Act of 2005. If so, identify the specific provisions implicated and explain the practical implications for the EDCs and the Authority.

CAE-031 A:

UI understands that this interrogatory references statements made in Eversource's July 9, 2026, comments.[1] UI did not independently analyze the applicability of the Public Utility Holding Company Act of 2005 ("PUHCA 2005") as part of its comments in this proceeding and does not offer a legal opinion regarding the applicability of any specific PUHCA 2005 provision to retail transactions involving standalone FTM storage resources.

To the extent PURA determines that a standalone FTM storage tariff should be further evaluated, UI would expect any applicable federal jurisdictional or statutory considerations to be reviewed as part of such a proceeding. However, UI is not currently aware of any specific PUHCA 2005 issue that would preclude further consideration of a retail tariff construct for standalone FTM storage resources and defers to applicable legal and regulatory authorities regarding interpretation of federal law.

[1] Eversource Comments July, 9, 2026