Date Filed: August 28, 2026

Witness: Davis, Edward A
Request from: Public Utilities Regulatory Authority

Question:

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.

Response:

This question falls outside the scope of this proceeding, which includes rates for sales by EDCs to standalone FTM storage resources; not rates for sales by FTM storage resources. Also, to the extent that this question seeks legal analysis, the Company is unable to provide legal analysis in an interrogatory response from a non-attorney witness, but the Company would be pleased to provide any requested legal analysis in a separate Legal Brief if PURA issues a Notice requesting Legal Briefs on this topic.

Nonetheless, without waiving its rights, the Company hereby provides the following substantive response to this interrogatory as follows:

Retail sales by EDCs **to** FTM storage resources, which are the only sales within the scope of this proceeding, would have no implications under the Public Utility Holding Company Act of 2005 on EDCs or the Authority. The Eversource Comments referenced in this interrogatory related to hypothetical retail sales by FTM storage resources.