March 6, 2026

Mr. Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Re: PURA Docket No. 26-08-08, Non-Wires Solutions Process Cycle 2, UI's Opposition to the Retention of Consultants by the Public Utilities Regulatory Authority

Dear Mr. Gaudiosi:

The United Illuminating Company ("UI") submits this correspondence in opposition to the Public Utilities Regulatory Authority's ("PURA's") February 27, 2026 Notice of Opportunity to Comment on the Retention of Consultants (the "Notice") in the above-referenced docket.

In the Notice, PURA identifies that it intends to continue its retention of Dunsky Energy + Climate Advisors ("Dunsky") as the Process Monitor in this Docket. The Notice invites Docket Participants to comment on the necessity or desirability of Dunsky's services.

In order to retain a consultant, C.G.S. § 16-18a requires that the consultant provides expertise in areas where PURA's staff lacks expertise or where it is necessary to supplement the existing expertise of PURA's staff. Further, C.G.S. § 16-18a requires PURA to find that the services of the consultant are *necessary* or *desirable* and limits the expenses of the consultant to no more than two hundred thousand dollars per proceeding. This cap may only be exceeded for good cause. As discussed below, given the expertise that PURA has developed in the Cycle 1 process docket, the engagement of any third-party consulting firm to serve in a Process Monitor role is no longer necessary or desirable, and good cause does not exist to exceed the statutory cap on expenses.

Docket No. 26-08-08 represents the second annual Non-Wires Solutions ("NWS") process cycle undertaken by PURA. While this process is still relatively new, several observations were made throughout last year's inaugural review, which form the basis of UI's comments and opposition.

First, affordability is a significant focus of Connecticut residents, the Connecticut General Assembly,[1] PURA, and UI. UI continuously balances the needs of their electric distribution system with the burden that investments may place on customers. The annual NWS process was specifically developed to illustrate the affordability decisions UI makes. The NWS Process is a transparent mechanism to leverage competitive forces to fully capture the benefits of NWS in meeting distribution system needs, with the ultimate objective of improving outcomes for ratepayers and advancing Connecticut's public

[1] *See, e.g.,* Conn. Pub. Act No. 25-173, An Act Concerning Energy Affordability, Access and Accountability, 2025.

policy goals.[2] The use of consultants for the Process Monitor in the past NWS dockets[3] have totaled to a significant cost of $341,991.69[4] to customers. While a consultant may have been helpful to PURA to develop the review and analysis process for this program, that process has now been established and PURA staff should be capable of assuming the role of Process Monitor for this and future cycles. Avoiding consultant costs in this docket will contribute toward a more affordable process for customers.

Second, keeping the Process Monitor function within PURA may reduce the risk of inconsistent communications during the annual process. In Docket No. 25-08-08, the Process Monitor was responsible for analyzing UI's filings in the docket, facilitating discussion meetings with the docket's stakeholders at various times throughout the year, and providing comments and suggested conclusions on UI's filed plans. While the Process Monitor and UI worked through numerous questions and comments throughout the year; it was not clear to UI whether PURA staff were actively involved in or aware of those discussions. The Proposed Screening Decision in Docket No. 25-08-08 contained several determinations that differed from the months of discussions held with the Process Monitor, suggesting that miscommunication occurred between the consultant and the PURA staff responsible for drafting the Proposed Screening Decision. Having PURA act as the Process Monitor would eliminate the potential for any miscommunication.

Alternatively, if PURA determines that the continued retention of Dunsky is necessary or desirable, UI respectfully request that the Process Monitor's role be clearly communicated and limited to only those tasks necessary to supplement PURA's existing expertise. Additionally, Dunsky should provide a budget of their expected costs for the year. PURA's staff should undertake as much of the Process Monitor's responsibilities as is practicable, in order to mitigate excessive consultant-related costs, avoid redundant work, and reduce unnecessary procedural delays. In the event that Dunsky is retained, UI expects PURA's staff to support the onboarding of the consultant, including engaging with UI to ensure Dunsky meets the criteria required by the UI to view confidential data.

UI appreciates the opportunity to comment on the retention of consultants by PURA in this docket. If you have any questions regarding UI's position, please contact the undersigned.

Sincerely,

Alex Soter

Alex Soter
Counsel
On behalf of the United Illuminating
Company

cc: Service List

[2] *See* PURA's November 9, 2022 Decision in Docket No. 17-12-03RE07 at 1.
[3] *See* PURA Docket Nos. 24-08-08, Non-Wires Solutions Process Initial Phase, and 25-08-08, Non-Wires Solutions Process Cycle 1.
[4] This figure is a summation of invoices received by both UI and Eversource from the Process Monitor since the inception of the NWS program.