EVERSOURCE ENERGY

March 6, 2026

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

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

Dear Mr. Gaudiosi:

The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or the "Company") submits this correspondence respectfully objecting to the Notice of Opportunity to Comment on the Retention of Consultants (the "Notice") issued in the above-referenced docket by the Public Utilities Regulatory Authority ("PURA") on February 27, 2026.

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. Under Conn. Gen. Stat § 16-18a, PURA is authorized to procure a consultant to provide expertise in areas where PURA's staff lacks expertise or where it is necessary to supplement the existing expertise of PURA's staff. Further, Conn. Gen. Stat. § 16-18a requires that PURA allow the opportunity for the parties and participants to the proceeding for which the services of a consultant are being considered to comment regarding the necessity or desirability of such services and hold a hearing, upon the request of a party or participant to the proceeding for which the services of a consultant are being considered.

Here, the Company is requesting that PURA pause this effort to retain Dunsky as there are problems with the docket that need to be addressed, potentially by a technical meeting. This request is in no way a comment on the expertise and integrity of Dunsky. For the reasons discussed below, the engagement of any third-party consulting firm to serve in a Process Monitor role is no longer necessary or justified in light of the expertise that PURA has established through the prior process docket. In addition, Docket No. 26-08-08 and the predecessor docket, Docket No. 17-12-03RE07, suffer from numerous procedural irregularities and unlawful motion rulings that need to be addressed by PURA before additional costs, resources, and time are devoted to this program.

With respect to a lack of justification to continue, Docket No. 26-08-08 represents the second annual Non-Wires Solutions ("NWS") process conducted by PURA. Although this process is still

relatively new, several observations were made throughout last year's inaugural review, which form the primary basis of Eversource's comments herein.

To meet its public-service obligation, the Company continuously balances the needs for infrastructure development on its electric distribution system to provide safe and reliable service to customers with the costs of those capital upgrades and the ultimate impact on customer bills. In keeping with this obligation, the original objective of the NWS process was (ostensibly) to identify infrastructure solutions that would leverage non-wires alternatives to lower the cost of service to customers where reasonable opportunities exist while maintaining service commensurate with Eversource planning and operating standards. In that regard, the NWS Process should function as a mechanism to leverage competitive forces to harness the benefits of NWS in meeting distribution system needs, with the ultimate objective of improving outcomes for customers and advancing Connecticut's public policy goals.[1] However, this is not what is happening in the docket for three reasons.

First, there are problems inherent in the structure of the program that cause it to be inordinately inefficient and ineffective. Over the course of time, beginning with PURA's conduct of the initial investigation of NWS in Docket No. 17-12-03RE07, numerous procedural irregularities occurred including the use of an external consultant in violation of ethical rules and substantive motion rulings issued under the signature block of the Executive Secretary. The culmination of these procedural irregularities was the issuance of a final decision in Docket No. 17-12-03RE07, and subsequent decisions, with numerous issues decided against both Eversource's and The United Illuminating Company's (together, the "EDCs") reasoned and informed recommendations creating an inefficient, inflexible, costly and ineffective program structure that will continue to drain resources and increase costs for customers without any productive outcome leading to the objectives sought for the program. Eversource is preparing correspondence on these procedural irregularities and plans to make a specific proposal to PURA for reforming this program. Consequently, the Company anticipates requesting a technical meeting with PURA to discuss the possible procedural alternatives for reforming the program.

Second, under these circumstances, PURA should not continue to incur the cost of an outside consultant because the costs are considerable and the program is not likely to be successful. Specifically, the use of consultants for the Process Monitor in the past NWS dockets[2] has resulted in a significant cost of $341,991.69,[3] which customers are called on to reimburse. Eversource expects that these costs will increase over time. However, it is not reasonable or appropriate for PURA to continue to incur these costs – ultimately to be paid by customers – where the program structure is inherently flawed and unlikely to produce any value. In addition, although 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 are in a position to assume the role of Process Monitor for this year's and future annual NWS dockets, particularly under circumstances where

[1] *See* PURA's November 9, 2022 Decision in Docket No. 17-12-03RE07 at 1.

[2] *See* PURA Docket Nos. 24-08-08, Non-Wires Solutions Process Initial Phase, and 25-08-08, Non-Wires Solutions Process Cycle 1.

[3] This figure was compiled by adding the invoices received by the EDCs from the Process Monitor since the inception of the NWS program.

PURA has undertaken an effort to reform the program so that it works better. Avoiding consultant costs in this docket will contribute toward a more affordable process for customers.

Third, keeping the Process Monitor function internal within PURA will avoid inconsistent communication during the annual process. In Docket No. 25-08-08, the Process Monitor was responsible for analyzing the EDCs' 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 the EDCs' filed plans. Although the Process Monitor and the EDCs worked through numerous questions and comments throughout the year, it was not clear to Eversource whether PURA staff actually remained engaged in those discussions as the Proposed Final Decision issued by PURA in Docket No. 25-08-08 included determinations that were inconsistent with the months of prior discussions and outcomes from the working group meetings. This disconnect between the work undertaken by the working group and PURA's handling of issues arising in the program year needs to be eliminated.

Eversource does not have any particular concern with Dunsky in its role of Process Monitor to this point. However, to the extent that PURA decides to continue to retain Dunsky (or retain another consultant) going forward, the Company respectfully requests that the Process Monitor's role be limited to only those tasks necessary to supplement PURA's existing expertise. Additionally, Dunsky (or any other consultant) should be required to 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, the Company expects PURA's staff to support the onboarding of the consultant, including engaging with the EDCs to ensure Dunsky meets the criteria required by the EDCs to view confidential data.

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

Sincerely,

Vincent P. Pace

Vincent P. Pace
Eric Eggleston
On behalf of the Connecticut Light and
Power Company d/b/a Eversource Energy

cc: Service List