May 8, 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

Dear Mr. Gaudiosi:

The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource") and The United Illuminating Company ("UI") (together, the "Electric Distribution Companies" or "EDCs") respectfully submit the enclosed Benefit Cost Analysis ("BCA") tool pertaining to Non-Wires Solutions ("NWS"), along with a narrative description and working example of the tool in compliance with the Notice of Docket Closing and Procedural Order ("Procedural Order") issued by the Public Utilities Regulatory Authority ("PURA") on April 17, 2026, in Docket No. 26-08-08, Non-Wires Solutions Process Cycle 2. The EDCs greatly appreciate PURA's willingness to take a fresh look at the NWS program structure to assure that it functions efficiently, benefits customers, and supports safe, reliable operation.

The EDCs share PURA's goal of establishing a constructive, efficient and cost-effective approach to the adoption of NWS for Connecticut electric customers. Accordingly, the EDCs take this opportunity to suggest certain interim programmatic changes for PURA's consideration while the NWS redesign docket gets underway.

I. Docket Closing Comments & Current Process Change Request

As noted, the EDCs acknowledge and appreciate PURA's actions and commitment to initiating a docket to redesign the NWS process. The commencement of this proceeding presents an important opportunity to re-evaluate current program-design elements, identify areas for improvement and implement reforms that will enhance deployment efficiency, regulatory clarity, and stakeholder coordination. To support PURA's efforts to improve the effectiveness and efficiency of the NWS process, and to inform future process reforms, the EDCs respectfully suggest three modifications to ease administrative burden and overhead to ongoing compliance filings required under Docket No. 24-08-08 Initiation Phase Final Decision until such time that changes are made through the new proceeding.

1. **Limit EDC Data Filing Requirements to System Data Requirements Only**. The EDCs propose that the EDC Data Filing requirements be limited to the submission of the System Data Requirements only as defined in Docket No. 17-12-03RE07, PURA Investigation into Distribution System Planning of the Electric Distribution Companies - Non-Wires Alternatives.[1] The Financial and Distributed Energy Resource ("DER") deployment information is already provided annually in compliance filings in the Clean and Renewable Energy Program Data and Report[2], Non-Residential Renewable Energy Solutions Program Review (NRES)[3], Shared Clean Energy Facility Program Review (SCEF)[4], Residential Renewable Energy Solutions Program Review and Rate Setting (RRES)[5], and in the EDCs' respective rate-case proceedings.[6] Narrowing the scope of this filing would reduce duplicative, repetitive and inefficient data reporting; consolidate the reporting of critical confidential information; and lessen unnecessary administrative burden on both PURA and the EDCs.

2. **Grid Needs Filing Modifications.** The EDCs propose the following modifications to the Grid Needs Filing requirements: (a) increase the project cost threshold to $1 million; (b) extend the planning horizon for identified needs to three years; and (c) exclude asset condition, maintenance-related and safety-driven projects from NWS review. These suggested interim modifications would better focus NWS screening on projects that are most suitable for non-wires alternatives,[7] thereby avoiding unnecessary expenditure of time and resources on projects that are not appropriate or amendable for NWS consideration from the outset. The Company stresses that, even with the increased thresholds, it will not pause NWS review of such projects internally and will report any identified projects in the filings to PURA.

3. **Reduce Filing Frequency from Quarterly to Biannual.** The EDCs propose modifying the current quarterly filing requirement to a biannual filing schedule. Transitioning from quarterly to biannual filings would significantly reduce the administrative burden on both PURA and the EDCs, while preserving the completeness, transparency and informational value of the existing reports. Specifically, the EDCs respectfully request that only the first and third quarter filings be retained and that the second and fourth quarter filings be eliminated.

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1 Appendix A- NWS Process Design Document at Exhibit A- Requirements for Annual EDC Data Filing. Page 30 of PDF.

2 DER related data was most recently filed in Docket No. 25-08-01 and filed annually thereafter on November 15th. See "All Projects" sheet.

3 Docket No. XX-08-03 Order No. 7.

4 Docket No. XX-08-04 Order No. 11.

5 Docket No. XX-08-02 Order No. 11.

6 UI's financials are included in its most recent Five-Year Capital Investment Plan Report filed in their recent rate proceeding in Docket No. 24-10-04.

7 During the straw proposal phase in Docket No. 17-12-03RE07, UI conducted a national scan of established Non-Wires Alternative programs demonstrating that the cost and suitability criterion are below average. UI's report is located here.

These filings can take weeks to compile, and reducing their frequency would result in significant time savings for both the EDCs and PURA without sacrificing value. As demonstrated by UI's 2025 fourth-quarter filing[8] and 2026 second-quarter filing,[9] no projects were submitted during those periods due to the high frequency of required filings. The majority of projects are identified and included in the first-quarter filing, as the EDCs typically have visibility at that point into the projects planned for the year. Any additional projects arising out of urgency can be addressed in the third-quarter filing. This approach preserves transparency with PURA and stakeholders, while reducing administrative burden and improving efficiency.

The EDCs appreciate PURA's consideration of these three suggested interim modifications. As it stands, the current requirements place a significant burden on the engineering staff of both companies, drawing on resources that are vitally needed by the businesses to focus on the delivery of safe, reliable service to customers. Both EDCs have experienced challenges associated with the administrative complexity of the NWS program as originally envisioned by PURA, particularly given its broad application to nearly all distribution projects.

These three interim modifications would substantially lessen the burdensome requirements, while maintaining meaningful review and consideration of potential NWS candidates, pending PURA's further review and deliberation on the appropriate NWS Framework.

The EDCs thank PURA for considering these interim changes.

II. Benefit Cost Analysis Narrative Document

As directed in the Procedural Order, the EDCs are presenting their joint draft NWS BCA tool as Appendix 1, Draft Eversource-UI_CT NWS BCA (Confidential). This section provides a narrative description of the tool to enhance usability and understanding. As previously communicated to the Process Monitor during the development of the BCA, the tool is confidential and is intended solely for use by the EDCs and PURA. Confidential treatment is necessary to prevent potential bidders from gaming the tool and to preserve the integrity of cost-effectiveness evaluations.

The NWS BCA tool was developed in coordination with the Process Monitor's feedback and within the established NWS Framework. The purpose of the draft NWS BCA tool is to evaluate the cost-effectiveness of technically viable proposals received through the program's competitive solicitation process. The BCA tool can serve as an analytical input, in combination with other inputs, to assist in identifying a winning bid or a portfolio of winning bids, as appropriate. The tool was designed with simplicity as a core principle to promote ease of use and consistent application.

Most importantly, the foundation of the NWS BCA Tool is the BCA tool used for the Conservation and Load Management programs ("C&LM"), ensuring alignment and consistency

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8 UI's 2025 fourth quarter filing.

9 UI's 2026 second quarter filing.

between the two evaluation processes. The NWS BCA Tool workbook consists of ten worksheets. The "User Information" sheet provides a summary of the purpose of each sheet within the workbook. The second worksheet, titled "Project Inputs," is used as the intake interface, where users enter key project information such as project cost, value of deferred distribution, dispatch strategy type, capacity, and energy values. The information entered on this worksheet is used by the remaining worksheets to calculate the Benefit-Cost Ratio ("BCR"), with total project costs and benefits, presenting various cost test ratios results summarized on the "Dashboard" worksheet.

The Calculation tab uses data from the Project Input tab along with values from the 2024 Avoided Energy Supply Cost ("AESC"), Uncleared Avoided Cost and Greenhouse Gas ("GHG") Factors tabs to calculate benefits that feed into the Dashboard. The Lookups and Assumptions tab contains the assumptions used throughout the tool, including discount rates and conversion factors for GHG emissions. The tab labeled "2024 AESC" provides the AESC values for different fuels such as electricity, gas, oil, and propane. This information derives from the regional 2024 AESC study and is used as inputs to the Calculation sheet. In addition, the Uncleared Avoided Cost sheet provides values for uncleared avoided capacity, while the GHG sheet supplies electricity GHG conversion factors used in the analysis.

The worksheets used to calculate the BCR are fully locked and populated with the assumptions and study results necessary to perform the required calculations. While these worksheets are locked to prevent inadvertent changes or calculation errors, the worksheets remain visible to promote transparency and understanding of the underlying methodology. The data sources used in the BCR calculations are also clearly identified and referenced. Although the established NWS cost-effectiveness test is the Modified Utility Cost Test ("MUCT"), the Dashboard presents the results of all standard cost tests for comparative purposes.

Lastly, the draft BCA tool includes an illustrative energy storage project to provide PURA with a practical example of how the tool would be completed and applied by the EDCs when evaluating a bidder's proposal for cost-effectiveness.

III. Conclusion

The EDCs respectfully submit this compliance filing in accordance with the Procedural Order and appreciate PURA's continued leadership and engagement in advancing the NWS Framework. The suggested interim modifications to PURA's filing requirements and Grid Needs screening are intended to reduce duplicative reporting, focus NWS review on projects most suitable for NWS and improve administrative efficiency without diminishing transparency or regulatory oversight while PURA and the parties to Docket No. 24-06-27 reform the overall NWS Framework.

In addition, the EDCs are presenting their joint draft NWS BCA Tool to support PURA's review and understanding of the methodology used to evaluate cost-effectiveness under the NWS Framework. The tool is aligned with the CL&M BCA framework and is designed to be transparent, consistent and practical, while maintaining appropriate confidentiality protection to preserve the integrity of the competitive solicitation process.

The EDCs look forward to continued collaboration with PURA and stakeholders through the forthcoming NWS redesign docket and respectfully submit that the suggestions and materials

included herein will assist in informing future program reforms that enhance the effectiveness, efficiency and the long-term success of the NWS program.

Sincerely,

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

Alex Soter
Alex Soter
On behalf of The United Illuminating Company

Attachment
cc: Service List