STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

March 10, 2026
In reply, please refer to:
Docket No. 26-08-08

Christie Prescott
Joel Kopylec
UIL Holdings Corporation
180 Marsh Hill Road
Orange, CT 06477

Vincent P. Pace, Esq.
Assistant General Counsel
Eversource Energy Service Company
107 Seldon Street
Berlin, CT 06037

Re: Docket No. 26-08-08 - Non-Wires Solutions Process Cycle 2

Dear Ms.Prescott and Messrs. Kopylec and Pace:

Enclosed are interrogatories numbered **RSR-1 through RSR-17.** Interrogatories numbered RSR-1 through RSR-14 are directed to The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource). Interrogatories numbered RSR-15 through RSR-17 are directed to The United Illuminating Company (UI).

The responses to these questions have been deemed necessary by the Public Utilities Regulatory Authority (Authority) in connection with the above-referenced docket and will become a part of the record in this proceeding. Please note that persons responsible for responses must be available for cross-examination during a hearing, if held, and must attest to the truth and accuracy of their responses.

Please submit the responses to the Authority's Executive Secretary no later than **March 24, 2026, at 4:00 p.m.** The Authority encourages the submission of responses as soon as they are available rather than delaying until all answers are completed. **Please list each question and answer on the same sheet of paper using a separate sheet for each interrogatory number, and sequentially number the pages of each response (e.g., p. 1 of 5, etc.). At the top of each page, clearly identify the Docket Number, the interrogatory number (including the prefix), the name of the company and the person responsible for the response, and the date of submission.**

Similarly, each Late Filed Exhibit that may be submitted after hearing in this docket shall be sequentially numbered and identified with the Docket Number, Late Filed Exhibit Number, page number, the name of the company and the person responsible for the exhibit, and the date of submission.

If a response to any of the requested information has already been filed in response to another Parties' interrogatory(ies) in this proceeding, please reference the interrogatory which provides the information. It is the respondent's responsibility to ensure that any such information is on file with the Executive Secretary of the Authority.

ELECTRONIC SUBMISSION OF FILINGS

IMPORTANT NOTE: The Authority has indefinitely suspended the paper copy filing requirement. Anyone filing material with the Authority should file only an electronic copy through the PURA Web Filing System. Please refer to the Electronic Filing webpage for more information, including on confidential materials: Make An Electronic Filing

CONFIDENTIAL DOCUMENTS

No confidential material may be filed publicly through the web filing system. Confidential material can be filed electronically by emailing the material to Jeff.Gaudiosi@ct.gov with a subject line labeled in all capital letters "CONFIDENTIAL MATERIAL - NOT FOR PUBLIC DISCLOSURE." Each page of any electronic confidential information shall also contain a header "CONFIDENTIAL – NOT FOR PUBLIC DISCLOSURE." The motion for a protective order shall be filed electronically.

The Authority operates with the strong presumption that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. §1-200 et. seq. In those exceptional circumstances where a participant believes that information it intends to file is confidential under law, it may file a Motion for a Protective Order requesting an exemption from public disclosure. The Motion must provide specific legal arguments with reference to state or federal law describing with supporting facts why the information should be kept confidential. A certified affidavit supplied by a competent witness in support of the Motion must be appended to the Motion. The Authority will rule on the Motion forthwith, and it will give further direction as necessary.

The current service list for this docket is available on the Authority's website located at http://www.dpuc.state.ct.us/DPUCPublicList.NSF.

By the Direction of the Authority,

PUBLIC UTILITIES REGULATORY AUTHORITY



Jeffrey R. Gaudiosi, Esq.
Executive Secretary

Enclosure
cc: Service List

Interrogatories RSR-1 through RSR-14 are directed to The Connecticut Light and Power Company d/b/a Eversource Energy (Eversource) and refer to Eversource's February 6, 2026, Compliance Filing in the instant proceeding and the associated attachments.

RSR-1 Provide the most up to date version of Eversource's Distribution System Planning Guide.

RSR-2 Describe the methodologies the Company uses to analyze remainder-of-life and asset health for station transformers (e.g., dissolved gas analysis). Provide any documents describing Eversource's internal methodologies, standards and procedures for testing and evaluating transformer asset health, disseminating test results to the Company's planning staff, and triggering an infrastructure replacement project.

RSR-3 Att. 5, System Data Requirement No. 9 (Confidential). For each substation identified by Eversource as having load within 90-100% of the normal rating or exceeding the normal rating, provide the following information:

a. A description of any planned or in-progress capital projects at these substations and the status of these projects;
b. The Firm Capacity of the substation;
c. The Load Carrying Capacity (LCC) of the substation;
d. The Distribution System Switching Capacity of the substation;
e. The date on which Eversource first identified the grid need;
f. A copy of the initial funding request forms;
g. If available, a copy of the solution selection forms;
h. If available, a copy of the project authorization forms.

RSR-4 Att. 16, pp. 3-5. Provide the following information for Project CD02440:

a. The date on which Eversource first identified the grid need;
b. A copy of the initial funding request form;
c. A copy of the solution selection form; and
d. A copy of the project authorization form.

RSR-5 Att. 16, pp. 3-5. Provide a map of the 14R31 Right-of-Way (ROW) and circuit which labels each substation and feeder. Highlight in the map the circuit segments which the company plans to rebuild.

RSR-6 Att. 16, pp. 3-5. Provide the number of customers served by the 14R31 circuit and any connected feeders broken out by customer class (commercial, industrial, residential).

RSR-7 Att. 16, pp. 3-5. For the three instances where the Company's conductor was 'burnt down':

a. Describe the N-1 event that triggered the switching (i.e. what component of the distribution system failed). If possible indicate the location of the failure on the map referenced in RSR-5;
b. Provide the dates and times of the failures and subsequent overloads;
c. Provide the loading conditions on each feeder before and after the failure (i.e, for each feeder, the load on the feeder and the ratio of that load to the feeder's peak load);
d. Provide the duration of the overload conditions which necessitated switching;
e. Explain why the Company did not reconductor the ROW with higher capacity conductors after the first time the conductor was burnt down.

RSR-8 Att. 16, pp. 3-5. For each of the eight reliability related outages on the 14R31 ROW in the last fifteen years, provide the following information:

a. The number of customers that experienced an outage broken out by customer class (residential, commercial, industrial);
b. The total number of outage minutes broken out by customer class;
c. An estimate of the lost load broken out by customer class.

RSR-9 Att. 16, pp. 3-5. Confirm that the Company analyzed the alternative battery storage solution assuming it would only reduce the load on the circuit during peak load conditions, not provide outage support to customers.

RSR-10 Att. 16, pp. 3-5. Justify the Company's 22.5 MWh sizing of the battery storage solution to the Campville14R31 ROW grid need by providing:

a. A narrative description of how the Company arrived at the value of 22.5 MWh as the minimum required size of the battery storage solution;
b. The peak load profiles demonstrating that a minimum of 6.25 MVA for four hours is required to eliminate overload conditions;
c. An explanation of why the Company assumed a 10-year growth rate of 1.43% and any historical data and forecast information to support this assumption.

RSR-11 Att. 16, pp. 3-5. Regarding the Company's estimate of $2 million per MWh of energy storage system capacity:

a. Provide a copy of the Request for Proposal (RFP) the Company issued to obtain the referenced contractor bids;
b. Describe how the Company advertised the RFP for the energy storage system including where the RFP was posted and the duration of the solicitation process;
c. Provide a copy of the proposals received by the Company from the bidding vendors (i.e., a copy of the vendor bids);

d. Provide the itemized cost breakdowns provided by the bidding vendors.

RSR-12 Att. 17. Provide the following for Project CS00606:

a. Explain why the Company is replacing the existing transformer at the substation;
b. Describe whether the transformer the Company is replacing has fully depreciated;
c. Provide the age of the transformer and the results of any internal assessment the Company has undertaken to evaluate the health and remainder-of-life of the transformer;
d. Identify the date on which the Company first identified the grid need;
e. Provide a copy of the initial funding request form;
f. Provide a copy of the solution selection form; and
g. Provide a copy of the project authorization form.

RSR-13 Att. 17. Provide the following for Project CS00503:

a. Explain why the Company is replacing the existing transformers at the substation;
b. Describe whether the transformers the Company is replacing have fully depreciated;
c. Provide the age of the transformers and the results of any internal assessment the Company has undertaken to evaluate the health and remainder-of-life of the transformers;
d. Identify the date on which the Company first identified the grid need;
e. Provide a copy of the initial funding request form;
f. Provide a copy of the solution selection form; and
g. Provide a copy of the project authorization form.

RSR-14 Att. 15. Provide the following for Projects CD02654 and CD02618:

a. Provide the margin of contingent overload and the number of hours during the year that this overload is forecasted to occur under a 90/10 planning scenario; and

b. Provide the number of customers in each class served by the relevant feeder

Interrogatories RSR-15 through RSR-17 are directed to The United Illuminating Company (UI) and refer to the UI's February 6, 2026, Compliance Filing in the instant proceeding and the associated attachments.

RSR-15 Provide the most up to date version of UI's system planning documentation. Specifically, the planning documentation should contain UI's standards for (1) the capital project approval process, (2) infrastructure planning criteria (e.g., thermal loading criteria, infrastructure replacement criteria etc.), and (3)

planning methodology (e.g., forecasting methodology, solution development process etc.).

RSR-16 Provide an update on the status of the three-energy storage system pilot projects approved in Docket No. 22-06-05, PURA Implementation of Public Act 22-55. Explain whether UI is developing and plans to issue an RFP for these projects and provide a timeline for the procurement.

RSR-17 See Docket No. 24-10-04, Application of the United Illuminating Company to Amend its Rate Schedule, UI Corresp., Nov. 12, 2024, UI Rate Application. Provide a copy of Exhibit UI-CIP-6, “Planned Plant Additions Support”, and Exhibit UI-CIP-7, “Five-Year Capital Investment Plan Report”.