STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE: APPLICATION OF JEWETT CITY WATER COMPANY TO AMEND ITS RATE SCHEDULES	**:**	**DOCKET NO. 26-08-14**
	:	
	:	**NOVEMBER 24, 2026**

THE OFFICE OF CONSUMER COUNSEL'S FIRST SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses from The Jewett City Water Company ("JCWC") to the following interrogatories in the above-captioned proceeding by **December 8, 2026**. If there are objections to any questions, or if providing responses to certain questions would be unduly burdensome, please contact the undersigned counsel as soon as possible.

I. INSTRUCTIONS

The responses to these interrogatories and production requests must be submitted in the following manner:

1. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the responding party's files (e.g., documents that in their original condition were stapled, clipped or otherwise fastened together or maintained in separate file folders shall be produced in such form). The responding party may submit photocopies (with color photocopies where necessary to accurately reproduce the document), in lieu of original documents, provided that such copies are true, correct and complete copies of the original documents.

2. Documents submitted shall be produced in the order in which they appear in the responding party's files and shall not be shuffled or otherwise rearranged. Mark each page with identification and consecutive document control numbers.

3. Data must be produced in the data format in which it is typically used and maintained. Moreover, to the extent a responsive document has been electronically scanned (for any purpose), that document must be produced in a readable and accessible electronic format, with the opportunity provided to review the original document.

4. Provide English translations of all responsive documents that exist in a language other than English.

5. Documents to be produced include all documents in the possession, custody or control of the responding party, wherever located, including documents in the possession, custody or control of the responding party's directors, officers, employees, representatives or agents. Without limitation on the term "control," a document is deemed to be in a responding party's control if it has the right to secure that document or a copy thereof from another person.

CLAIMS OF PRIVILEGE

If you contend that any answer to any interrogatory or any document demanded by these interrogatories is privileged in whole or in part, file with your response to these Interrogatories a statement in writing and under oath and in such statement: (1) identify each such interrogatory answer or document; (2) state its general subject matter; and (3) state in detail the basis for each claim of privilege made with respect to it. If a claim of privilege is made to only a part of a document, then in addition to the statement required herein, produce a public copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

If subsequent to your initial compliance with these interrogatories and production request you discover additional or new material or information responsive to any interrogatory or request for production, or you discover that any response you provide herein was totally or partially incorrect or, though correction was made, is no longer true, you must promptly (a) file any additional responsive documents that come into your possession, custody or control or (b) file supplemented, corrected, and sworn responses. You are specifically directed to supplement, modify or correct your responses to each of these interrogatories and production throughout until a final decision is adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-1 through OCC-43 are directed to JCWC.

OCC-1. **(ROE)** Refer to Drakes PFT, p. 5. Provide the quarterly ROE calculation from 2020 – present, and include authorized and actual capital structure.

OCC-2. **(ROE)** Please explain the principal factors contributing to the Company's negative 4.42% return on equity in the 2025, including an explanation of decrease from prior year's earnings. Identify and quantify any non-recurring expenses or other unusual circumstances that contributed to this result.

OCC-3. **(ROE)** Please estimate the annual costs associated with producing, treating, and distributing non-revenue water, including energy, chemicals, and other operating expenses, and explain the extent to which these costs contribute to the Company's inability to achieve its authorized ROE.

OCC-4. **(ROE)** Refer to Drakes PFT, Lines 114-7, please quantify the annual costs incurred by the Company to maintain and repair its transmission and distribution mains for each year from 2022 through 2025, and explain the extent to which increases in these costs have contributed to the Company's inability to achieve its authorized ROE.

OCC-5. **(Ratemaking Treatment)** Provide a list of Operating and Maintenance expenses and items included in the Company's requested revenue requirements where JCWC is proposing ratemaking treatment that is different from: (a) The Authority's Decision in JCWC's last rate case, Docket No. 20-10-31 and (b) The Authority's Decision in Hazardville Water Company's recent rate proceeding, Docket No. 25-07-12.

OCC-6. **(WICA)** Sherwood PFT, p. 5. Provide the current WICA revenues as % of the company's overall revenues.

OCC-7. **(PFAS)** Sherwood PFT, p. 3. Is the company contemplating a PFAS tracker (WQTA)?

OCC-8. **(Operating Income)** Refer to Sherwood PFT, p. 6. Provide the expected net loss excluding WICA surcharge and revenue adjustment mechanism.

OCC-9. **(O&M)** Refer to Sherwood PFT, p. 6. Provide the annual expenses for operating treatment facilities, pumping stations, storage, and system monitoring since the Company's last rate case.

OCC-10. **(CPI)** Refer to Sherwood PFT, p. 6. Provide actual annual O&M costs since the Company's last rate case and the corresponding annual % increase. Provide annual Consumer Price Index increase and contrast.

OCC-11. **(CPI)** Provide any source documents the company utilized for Consumer Price Index calculations.

OCC-12. **(Plant)** Refer to Sherwood PFT, p. 7. Will the Company be filing updates to the status of the plant anticipated to be in service as of the last day of the hearings or late-filed exhibit update?

OCC-13. **(Consumption)** Refer to Sherwood PFT, p.7. Provide the average consumption per customer since the Company's last rate case.

OCC-14. **(Consumption)** Refer to Sherwood PFT, p. 7. Explain the appropriateness of using the test year amounts of consumption in a declining consumption environment.

OCC-15. **(ROE Adder-reliability)** Refer to Sherwood PFT, p. 8. Provide interruptions in service to customers since the company's last rate case on an annual basis. Provide number of customers affected, main breaks, routine maintenance, upgrade outages, and customer notices.

OCC-16. **(ROE Adder-Rates)** Refer to Sherwood PFT, p. 8. Provide a comparison of the Company's rates to other water utilities in Connecticut.

OCC-17. **(Reopener)** Refer to Sherwood PFT, p. 10. Has the Company started the work related to the Hopeville storage tank? Provide a project progress update and expected completion date.

OCC-18. **(Rate Case Expense)** Refer to Sherwood PFT, p. 10. Has the Company retained any consultants in this proceeding?

OCC-19. **(Maintenance – Transmission & Distribution)** What percentage of mains and services had a break in 2025 compared to 2021-2024? Is the Company performing additional inspections/monitoring of areas with older materials to help anticipate future breaks in mains and services?

OCC-20. (**Leaks)** The Company states that "unidentified leaks increase the production of a high percentage of water that is not sold" and that "[t]his cost is reflected in the Company's proforma estimates" (Exhibit A.2 D. Drakes Testimony, lines 146–148).

a. What is the estimated annual cost to the Company of producing and distributing this lost/non-revenue water?
b. The Company acknowledges that "this is a cost for which the ratepayer should not be burdened" (Exhibit A.2 D. Drakes Testimony lines 148–149). Are these costs included in the Company's proposed revenue requirement? If so, please explain why. If not, please explain how they were excluded.

OCC-21. **(Leak Detection Program)** The Company states that "The Company also started an aggressive leak detection program to further drive down cost associated with lost and unaccounted for water" (Exhibit A-1. Sherwood Testimony lines 152-154).

a. When did the Company implement this program?
b. The Company's 2025 Non-Revenue Water Report, Exhibit R Order #3, says "the Company contracted with a leak detection service". Please provide the cost and duration of that contract.
c. Is this program different than the ones documented from 2021 to 2025 within Exhibits N-R? If so, what benefits does this program provide to drive down costs related to 'lost and unaccounted for water'?

OCC-22. **(Water distribution)** Provide a map of the water distribution system and the average water consumption per customer in 2025.

OCC-23. **(Laboratory Testing)** The Company states that "Laboratory analyses are made on a regular basis with a private, state-certified laboratory." (Exhibit A-1. Sherwood Testimony lines 51-52)

a. What type of testing is performed during the laboratory analysis?
b. How frequent is the testing performed?
c. Provide the most recent results of laboratory analysis that was performed in 2025.

OCC-24. **(Debt and interest)** The Company states that "[t]he increase in interest expense is driven by the addition of long-term debt in 2022 and the short-term [debt] carried in the test year" (Exhibit A.2 D. Drakes Testimony lines 580–581).

a. What was the principal amount of the long-term debt incurred in 2022, and what were its interest rate and repayment terms?
b. Was the interest rate consistent with prevailing market rates for comparable borrowing in 2022? Please explain and provide supporting documentation.

OCC-25. **(Debt and interest)** The Company references "short-term debt of $450K at an annual rate of 6.5%" (Exhibit A.2 D. Drakes Testimony lines 578–579). The Company identifies a line of credit with an interest rate of 6.75% (Schedule D-1.0, line 18) and projects no outstanding balance as of May 31, 2027.

a. Please explain whether the $450,000 in short-term debt and the line of credit identified in the capital structure are the same.
b. Why the testimony identifies an interest rate of 6.5%, while the capital structure identifies 6.75%.
c. Please explain when the outstanding short-term debt is expected to be repaid and how that repayment will be financed, or if it has already been repaid.
d. Provide any other fees and charges associated with the short-term debt incurred.

OCC-26. **(Debt and interest)** The Company states that its "current average cost of debt, including a Line of Credit was 3.99%" (Exhibit A.2 D. Drakes Testimony lines 641–642).

a. Please explain how the 3.99% average cost of debt was calculated, including whether the $450,000 in short-term debt at 6.5% was included.
b. Please explain the basis for the Company's proposed capital structure of 55.43% equity and 44.57% debt, including why the Company believes this structure is reasonable given its relatively low cost of long-term debt.

OCC-27. **(Generators)** The Company states that “the Company has improved the strength of Connecticut’s water planning and policy... upgraded process controls (SCADA) and installation of generators at the pumping facilities” (Exhibit A-1. Sherwood Testimony lines 137-144). Given this statement, provide the following details:

a. Type of generators installed
b. Number of generators replaced
c. Number of generators installed and installation date
d. Cost of each generator
e. Estimated useful life

OCC-28. **(Stone Hill Treatment Plant)** When does the Company expect to complete the replacing of filtration units at the Stone Hill Treatment Plant?

OCC-29. **(Infrastructure Investments)** Provide details on what infrastructure replacements have been performed for customers. What percentage of customers have had infrastructure replacements in 2021-2025?

OCC-30. **(Employee Benefits)** Provide the total number of participants in the medical plan from 2020 to 2025.

a. What alternative plans were implemented by the Company to lower the cost?
b. When were these alternative plans introduced and offered to the employees?
c. Provide a breakdown of employees who opted into an alternative plan? (Refer to Drakes PFT, lines 333-348).

OCC-31. **(Compensation)** For the period, 2020 – Present and that is proposed for the Rate Year, provide a list of wages and salaries by employee position, include bonuses and incentive compensation. For the same period include the level of compensation capitalized and charged to the parent company and other affiliated companies.

OCC-32. **(Compensation)** Refer to Sherwood PFT, p. 12. Specify what is meant by 'additional investment in its personnel'.

OCC-33. **(Board Expenses)** Refer to SCHEDULE C-4.16. Explain the increase in directors' fees from $10,720 in 2020 to $36,400 in the Test Year.

OCC-34. **(Board Expenses)** Refer to SCHEDULE C-4.16. Provide the number of Board and committee meetings held annually from 2020 through the Test Year.

OCC-35. **(Board Expenses)** Refer to SCHEDULE C-4.16. Provide a detailed breakdown of expense lines found at SCHEDULE C-4.16 (Miscellaneous General Expenses, Directors' Fees, and Directors' Meeting Expenses), identifying the nature, purpose, and amount of each expense included in the proposed revenue requirement.

OCC-36. **(Customers)** Refer to Drakes PFT, p. 8. Provide the source materials for Jewett City residents' income levels and poverty rate.

OCC-37. **(Customer Service)** Refer to Sherwood PFT, p. 10, lines 182-7, please explain how the Company has ensured that customers continue to have adequate access to customer service following the closure of its Jewett City office on December 31, 2025, including how customers know where to go for service, and if any customer complaints have been received on ability to access service.

OCC-38. **(Electricity - Purchased Power)** Did JCWC use a six-year average of kilowatt hour usage to calculate rate year electricity expenses? Did the Company use a six-year average of water sales to calculate the rate year revenues? Explain any inconsistencies.

OCC-39. **(Electricity – Purchased Power)** Did JCWC apply a 15% rate increase for Eversource to calculate rate year purchased power expenses? Explain how the Company applied rate decreases that occurred effective May 1, 2026 in its calculation of Rate Year purchased power expenses.

OCC-40. **(Electricity – Purchased Power)** Provide 2025 and 2026 electric bills used to calculate Purchased Power in Schedule C-4.2.

OCC-41. **(Electricity – Purchased Power)** Does JCWC purchase its electricity supply from Eversource or a third-party competitive supplier? Detail any attempts by JCWC and Hazardville Water to contract together from competitive suppliers?

OCC-42. **(Outside Services)** Refer to Schedule C-4.12. Explain the outside services balance in 2023 of $29,567. Was this considered a one-time fee? Was the entire balance related to 'Recruiting Fees'?

OCC-43. **(Temporary Labor)** Refer to Schedule C-4.12. Explain the temporary labor balance in 2024 of $48,573. What labor was allocated from Hazardville? What was the temporary labor utilized for?

Respectfully submitted,

CLAIRE E. COLEMAN
CONSUMER COUNSEL

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CERTIFICATE OF SERVICE

I do hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Dated at New Britain, Connecticut this 24th day of November 2026.

/s/Julie Lelek
Commissioner of the Superior Court