STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**PETITION FOR INVESTIGATION**	**:**	**DOCKET NO. 26-09-18**
	INTO THE BILLING PRACTICES	**:**	
	OF OLD NEWGATE RIDGE	**:**	
	WATER COMPANY	**:**	**OCTOBER 21, 2026**

THE OFFICE OF CONSUMER COUNSEL'S
FIRST SET OF INTERROGATORIES

The Office of Consumer Counsel ("OCC") hereby requests responses Old Newgate Ridge Water Company to the following interrogatories in the above-captioned proceeding by **November 4, 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:

A. 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.

B. 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.

C. 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.

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

E. 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 in adopted by the Authority in this Docket.

II. INTERROGATORIES

Interrogatories OCC-1 through OCC-4 are directed to the Old Newgate Ridge Water Company ("Company"):

OCC-1. Please provide an unlocked Excel spreadsheet indicating from January 1, 2013, to the present: each customer of the Company (identified in a manner that does not identify the name of the customer) and each month in which the Company billed that customer.

OCC-2. Does the Company have any liens on customer properties? If yes, please provide an unlocked Excel spreadsheet indicating by customer (identified in a manner that does not identify the name of the customer) the amount of the lien and when it was placed.

OCC-3. Identify the individual(s) responsible for responding to customer complaints and billing inquiries, including each individual's name, title, telephone number, and email address.

OCC-4. If different from the individual identified in response to OCC-3, please identify those responsible for responding to requests from the State of Connecticut.

Respectfully submitted,

STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

CLAIRE E. COLEMAN
CONSUMER COUNSEL

By: /s/ Kimberly White

Kimberly White
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10 Franklin Square
New Britain, CT 06051
860.827.2695

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 21st day of October, 2026.

By: /s/ Kimberly White

Kimberly White
Commissioner of the Superior Court