

**STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY**

ADMINISTRATIVE PROCEEDING TO : DOCKET NO. 20-01-01
REVIEW THE CONNECTICUT LIGHT :
AND POWER COMPANY'S STANDARD :
SERVICE AND SUPPLIER OF LAST :
RESORT SERVICE 2020 PROCUREMENT :
RESULTS AND RATES : JULY 30, 2020

**FIRST SET OF INTERROGATORIES SUBMITTED BY
WILLIAM TONG, ATTORNEY GENERAL FOR
THE STATE OF CONNECTICUT, TO
THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A
EVERSOURCE ENERGY**

William Tong, Attorney General for the State of Connecticut, hereby requests that The Connecticut Light & Power Company d/b/a Eversource Energy ("Eversource") answer all of the following interrogatories no later than **August 13, 2020**. In the event that the information requested herein has been provided in this proceeding, the response need only specifically identify where the responsive data or information is located in the record.

I. DEFINITIONS

A. As used in these interrogatories, "any" shall include "all," and "all" shall include "any," as needed to make the request inclusive and not exclusive.

B. As used in these interrogatories, "and" shall include "or," and "or" shall include "and," as needed to make the request inclusive and not exclusive. For example, both "and" and "or" mean "and/or."

C. As used in these interrogatories, "include" and "including" mean "including but not limited to."

D. As used in these interrogatories, "concern" and "concerning" mean "relate," "relating," "refer," referring, "reflect," "reflecting," "about," "constitute" or "constituting."

E. As used in these interrogatories, "document" means all materials and tangible forms of expression in each company's possession, custody or control, whether drafts or unfinished versions, originals or nonconforming copies thereof, however, or by whomever prepared, created, produced, maintained, used, sent, received, dated, or stored (manually, mechanically, electronically or otherwise), including books, papers, records, files, notes, e-mails, messages, bulletins, personal digital assistants (PDA's), smartphones (e.g., "Blackberry's," "iPhone," "Droid") and other mobile electronic devices, or other electronic, social or industrial web-based media (e.g., Facebook®, Twitter®, LinkedIn®) within your control, letters, chronologies, charts, studies, graphs, computer printouts, receipts, schedules, itineraries, declarations, affirmations, affidavits, deposition transcripts or other sworn, affirmed or unsworn statements, scripts, press releases, minutes, summaries, analyses, correspondence, memoranda, work papers, ledger sheets, confirmations, cables, wires, telecopies, facsimiles, telegrams, telexes, telephone logs, notes or records of conversations or meeting, contracts, agreements, notices, advertisements and including all metadata in all electronic documents.

F. "You," "your," or "your company" shall mean Eversource.

G. "Communicate" or "communication" means every manner or means of disclosure, transfer or exchange, and every disclosure, transfer or exchange of ideas or information, whether orally, by document, or electronically, or whether face-to-face, by telephone, mail, personal delivery, electronic transmission, or otherwise.

H. "Identify," "identity," or "identification," (1) when used in reference to a natural person, means to state his or her full name and present or last-known address, present or last-known position and business affiliation and each position with you, social security numbers, and telephone numbers for residence and business; (2) when used in reference to any other person means to state its full name, present or last-known address, and telephone number; (3) when used in reference to a document means to state the type of document (i.e., letter, memoranda, chart, handwritten notes, calendar (electronic or paper), spreadsheet, sound reproduction, report, computer inputs or outputs, etc.) , the location where maintained, your identifying marks and code, the subsidiary, division, or department where prepared and sent, the document date, the author and persons to whom copies were sent or persons initialing or reading or approving the document, and the name and address of each of the present custodians of the document; (4) when used in reference to an event or instance means to identify each natural person involved in the event, to state when and where the event occurred, to state a description of the nature and substance of the event, and to identify any document related to the event; (5) when used in reference to a communication means to state each communication, the persons involved in the communication, where the communication took place, and a brief description of the substance of the communication, and to identify any document related to the communication.

II. INSTRUCTIONS

The response to these interrogatories shall be submitted in the following manner:

A. Documents provided shall be complete and, unless privileged, unredacted, submitted as found in the company'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 company 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. Number each box and mark each box with corporate identification and the name(s) of the person(s) whose files are contained in that box. Documents shall be submitted in sturdy cartons not larger than 1.5 cubic feet. Cartons shall be filled completely.

C. Documents submitted shall be produced in the order in which they appear in the company's files and shall not be shuffled or otherwise rearranged. Mark each page with corporate identification and consecutive document control numbers. Place all documents produced in file folders. Mark each file folder with corporate identification, the name of the person whose documents are in the folder and how the original file was labeled.

D. Documents should be produced as they are maintained in the normal course of business, and thus if documents are maintained in electronic form, they should be produced in electronic form. 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. Documents that have been electronically scanned should be produced in a .tif (TIFF image format) files, with an Opticon load file and a Concordance database with beginning and ending page, and numbers of pages noted. If a Concordance database is not attainable, a .csv (Comma Delimited Text) file with the same information is acceptable, with a caret (^) used to separate multi-value fields. If the OCR data is provided in individual text (.txt) files and there is no text for a text file, the following should be inserted in that text file; "Page intentionally left blank." If your documents are maintained electronically in an OCR (Optical Character Recognition) format, produce OCR text as well. Moreover, this production must include all objective coding for the production, to the extent it exists.

E. For electronic mail, please provide all responsive emails and if applicable, email attachments and any related documents, in a Concordance database format with .tif images, an Opticon load file, and an OCR (Optical Character Recognition) file. If a Concordance database is unattainable, please provide the data in a .pst (Outlook personal folder) file.

F. Produce deposition, proceeding, and trial transcripts in manuscript form, with a word index, and electronically on CD or DVD. The electronic version of the transcripts should be in Live notes PTF (Portable Transcript Format), PCF (Portable Case Format), or Plain Text format.

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

No agreement by the Attorney General of the State of Connecticut purporting to modify, limit, or otherwise vary these interrogatories shall be valid or binding on the Attorney General of the State of Connecticut unless confirmed or acknowledged in writing by a duly authorized representative thereof.

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 copy of such document from which the alleged privileged portion has been redacted, noting where in the document such redactions have been made.

SCOPE

Except where otherwise indicated, this set of Interrogatories covers the period from January 1, 2015 up to and including the termination of the PURA's investigation of the facts and circumstances disclosed in the documents and information responsive to these interrogatories.

If subsequent to your initial compliance with these interrogatories 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) produce any additional responsive documents that come into your possession, custody or control or (b) notify the Attorney General of the State of Connecticut, or his designee, and serve supplemented, corrected, and sworn responses upon the Attorney General of the State of Connecticut, or his designee.

III. INTERROGATORIES

AG-1) Describe how the costs of the power purchase agreement for the Millstone Nuclear Power Station assessed to consumers through the Non-Bypassable Federally Mandated Congestion Charge (“NBFMCC”) are determined.

AG-2) Describe all factors that led Eversource to increase the weighted average NBFMCC rate effective July 1, 2020.

AG-3) Describe how conditions in the energy market may affect the costs of the power purchase agreement for the Millstone Nuclear Power Station assessed to consumers through the NBFMCC.

AG-4) State how long Connecticut consumers will be assessed costs for the power purchase agreement for the Millstone Nuclear Power Station. Explain whether Connecticut consumers can expect those costs to rise or fall during this time.

AG-5) Describe the total amount of costs to be recovered from consumers for 2020 as a result of the power purchase agreement for the Millstone Nuclear Power Station.

AG-6) Describe how often Eversource adjusts the percentage of costs assessed to customers as a result of the power purchase agreement for the Millstone Nuclear Power Station.

AG-7) Describe the customer impact of deferring your recovery of costs for the power purchase agreement for the Millstone Nuclear Power Station.

AG-8) Describe all factors that contributed to the increase in the Transmission Adjustment Clause (“TAC”) effective on July 1, 2020.

AG-9) Describe all factors that contributed to the increase in the Electric System Improvements Tracker Charge effective on July 1, 2020.

AG-10) Compare both residential and non-residential customer usage in May through June 2020 as compared to May through June 2019. Describe the factors that led to any changes in usage patterns.

AG-11) Provide in terms of both dollars and percentages of average (700 kWh/Mo.) residential electric bill the impact of uncollectibles for June 2018, 2019 and 2020. Please provide actual or estimated deferred revenues resulting from additional uncollectibles since March 2020, as well as costs related to the Docket No. 20-03-15 – *Emergency Petition of William Tong, Attorney General for the State of Connecticut for a Proceeding to Establish a State of Emergency Utility Shut-off Moratorium*. Please provide similar calculations in dollar amounts and as a percentage of average

residential bills that includes the impacts of estimated additional uncollectibles resulting from this moratorium and the ongoing public health crisis resulting from Coronavirus.

AG-12) Describe any other factors, not addressed above, that will or may impact rates charged to consumers in the next five years, including the nature of, expected impact of and reasons for each such factor.

AG-13) Describe any changes by you, PURA, the legislature, ISO New England or FERC that could result in lower electric rates for consumers, and describe the term over which you would expect those changes to take effect and the impact you would expect.

Respectfully submitted,
WILLIAM TONG
ATTORNEY GENERAL

By: /s/ Lauren H. Bidra

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I hereby certify that a copy
of the foregoing has been mailed,
electronically filed, and/or
hand-delivered to all known
parties and intervenors of record on
the above referenced date.

/s/ John S. Wright
John S. Wright
Commissioner of the Superior Court