

April 1, 2022

**VIA eTariff Filing**

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

**RE: The Connecticut Light and Power Company  
Proposed Change to Depreciation Rate in CL&P's Appendix D to  
Attachment F of the ISO-NE OATT  
Docket No. ER22- -000**

Dear Secretary Bose:

Pursuant to Section 205 of the Federal Power Act (“FPA”)<sup>1</sup> and Part 35 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission<sup>2</sup> (the “Commission”), The Connecticut Light and Power Company (“CL&P” or the “Company”) hereby submits for filing proposed changes to the transmission plant depreciation rate for the Norwalk Harbor-Northport underground transmission line set forth in CL&P’s Appendix D to Attachment F of the ISO New England Inc. (“ISO-NE”) Open Access Transmission Tariff (“ISO-NE OATT”).<sup>3</sup> The proposed depreciation rate will be used to calculate CL&P’s annual transmission revenue requirements for transmission service under the ISO-NE OATT, and will result in a reduction in CL&P’s revenue requirement of approximately \$215,199 annually.<sup>4</sup>

In Order No. 618, the Commission determined that utilities changing their method of depreciation for accounting purposes could do so without making a formal filing with the

---

<sup>1</sup> 16 U.S.C. § 824d (2006).

<sup>2</sup> 18 C.F.R. Part 35 (2021).

<sup>3</sup> The ISO-NE OATT is Section II of the ISO New England Inc. Transmission, Markets and Services Tariff.

<sup>4</sup> CL&P is making this filing proposing changes to its Appendix D to Attachment F of the ISO-NE OATT in accordance with CL&P’s rights under Section 3.04(a)(i) of the Transmission Operating Agreement among ISO-NE and the New England Participating Transmission Owners (“PTOs”) to submit filings under FPA Section 205 to revise an individual PTO’s revenue requirements. ISO-NE is submitting this filing through eTariff as a courtesy to CL&P because only ISO-NE holds the administrative rights to submit filings through eTariff pertaining to the ISO-NE OATT.

Commission.<sup>5</sup> However, the Commission held that any proposal to modify prices charged for transmission service, “whether determined by stated or formula rates,” must do so pursuant to a filing under Section 205 of the FPA.<sup>6</sup> As explained further below, through this filing, CL&P proposes to revise a single transmission plant depreciation rate for transmission service in accordance with FERC Staff’s recommendation in an Audit Report relating to CL&P issued on February 4, 2022 in Docket No. FA19-8-000 (the “Audit Report”).<sup>7</sup> As support for the proposed change in the depreciation rate, CL&P is submitting the testimony and exhibits of Timothy J. Ryan (Exhibit No. CL&P-1 and Exhibit No. CL&P-2). Also included is a Depreciation Study prepared by Mr. John Spanos of Gannett Fleming Valuation and Rate Consultants, LLC (Exhibit No. CL&P-3).

CL&P respectfully requests an effective date of July 1, 2022, which is the first day of the month that is 60 days after the date of the filing. To the extent necessary, CL&P respectfully requests waiver of any regulations necessary for the Commission to accept this filing and to grant the requested effective date.

## **I. BACKGROUND**

CL&P is a public utility subsidiary of Eversource Energy, a Massachusetts business trust and public utility holding company under the Public Utility Holding Company Act of 2005.<sup>8</sup> CL&P owns and operates transmission facilities in the state of Connecticut that are used to provide Regional Network Service under the ISO-NE OATT, and Local Service under Schedule 21-ES of the ISO-NE OATT. CL&P is a PTO under the terms of the Transmission Operating Agreement (“TOA”) by and among the PTOs and ISO-NE.<sup>9</sup> Effective February 1, 2005, the date on which ISO-NE operations as a Regional Transmission Organization began in New England, CL&P, among other PTOs,<sup>10</sup> transferred operational control over its transmission facilities to ISO-NE pursuant to the TOA, and ISO-NE provides regional services over such facilities as set forth in the ISO-NE OATT and the TOA.

The proposed changes in this filing arise directly from a recommendation made by FERC Audit staff in Docket No. FA19-8-000. Specifically, in the Audit Report, FERC Staff included Recommendation #26, which suggested that CL&P:

---

<sup>5</sup> *Depreciation Accounting*, Order No. 618, FERC Stats. & Regs. ¶ 31,104, at ¶ 61,695 n.25 (2000).

<sup>6</sup> *Id.*

<sup>7</sup> The Connecticut Light and Power Co., Audit Report, Docket No. FA19-8 (Feb. 4, 2022)

<sup>8</sup> Energy Policy Act of 2005, Pub. L. No. 109-58, § 1262, 119 Stat. 594, 972-73 (2005).

<sup>9</sup> The Commission accepted the TOA in *ISO New England, Inc.*, 106 FERC ¶ 61,280; *order on rehearing*, 109 FERC ¶ 61,147 (2004).

<sup>10</sup> CL&P’s public utility affiliates, NSTAR Electric Company and Public Service Company of New Hampshire, are also PTOs under the TOA.

File a depreciation study and associated depreciation rate for the Norwalk Harbor-Northport underground transmission line in a docket relating to its transmission formula rate within 60 days of issuance of the audit report.<sup>11</sup>

## **II. THIS FILING**

As further detailed in the testimony of Timothy J. Ryan (Exhibit No. CL&P-1) and the Depreciation Study prepared by Gannet Fleming (Exhibit No. CL&P-3), CL&P is making this filing to propose changes to the depreciation rate for the Norwalk Harbor-Northport underground transmission line in response to the Audit Report.

The estimated impact on the Company's transmission depreciation expense is presented by Mr. Ryan in Exhibit No. CL&P-2. This estimated impact is shown using actual 2021 data. As shown in Exhibit CL&P-2, the proposed update to the depreciation rate for CL&P's Norwalk Harbor-Northport transmission line results in an estimated annual *decrease* of approximately \$215,199 in CL&P's depreciation expense compared to CL&P's depreciation expense for this asset using data as of December 31, 2021.

CL&P has revised its Appendix D to Attachment F of the ISO-NE OATT to reflect this change in depreciation rate used in calculating CL&P's transmission revenue requirements. The clean and redline tariff section filed herewith reflects the updated transmission plant depreciation rate proposed herein.

## **III. METHODOLOGY OF THE DEPRECIATION STUDY**

As described in more detail in Exhibit No. CL&P-3, the recommended depreciation accrual rate for the Norwalk Harbor-Northport underground transmission line is based on the surviving plant in-service and accumulated depreciation (book reserve) as of December 31, 2021. The resulting depreciation rate of 2.20% was based on the survivor curve and net salvage parameters that represent the most appropriate estimates for recovery of the type of assets in-service and the remaining life of the asset as well as the past recovery patterns.

## **IV. PROPOSED EFFECTIVE DATE AND WAIVER REQUEST**

CL&P respectfully requests that the proposed tariff changes and revised transmission plant depreciation rate for Norwalk Harbor-Northport underground transmission line be made effective as of July 1, 2022, which is the first day of the month that is 60 days after the date of this filing.

To the extent necessary, CL&P respectfully requests waiver of the full requirements of 18 C.F.R. § 35.13 or any other applicable regulations. Good cause exists for granting this waiver as

---

<sup>11</sup> Audit Report at p. 5. See also *The Connecticut Light and Power Company*, Docket No. FA19-8 (February 4, 2022) (delegated letter order) (order approving audit report).

this is a single-issue FPA Section 205 filing to comply with a recommendation from the Audit Report. The Commission generally permits single-issue rate filings for changes in depreciation rates.<sup>12</sup> In addition, the terms of a settlement governing, *inter alia*, ISO-NE OATT Attachment F that was approved by the Commission in 2020 (“Formula Rate Settlement”) included a moratorium on changes to certain portions of Attachment F proposed pursuant to either Section 205 or Section 206 of the Federal Power Act that extends until December 31, 2024, with certain enumerated exceptions.<sup>13</sup> The language in ISO-NE OATT, Attachment F specifically excludes filings to change transmission depreciation rates beginning in year three of the moratorium period (i.e., 2021), and provides that any such filings during the moratorium period shall be limited to a review of those transmission depreciation rates.<sup>14</sup>

## V. DOCUMENTS SUBMITTED WITH THIS FILING

This filing includes following:

- This transmittal letter;
- eTariff Record;
- Exhibit No. CL&P-1: Direct Testimony of Timothy J Ryan;
- Exhibit No. CL&P-2: Revenue Impact Statement showing a reduction in CL&P’s transmission revenue requirement as the result of the proposed depreciation rate for the Norwalk Harbor-Northport underground transmission line;
- Exhibit No. CL&P-3: Depreciation Study for CL&P Norwalk Harbor-Northport underground transmission line prepared by Gannet Fleming;
- Attachment A: Clean Tariff showing proposed depreciation rates for the Norwalk Harbor-Northport underground transmission line in CL&P’s Appendix D to Attachment F of the ISO-NE OATT,<sup>15</sup>

---

<sup>12</sup> See, e.g., *Ameren Illinois Co.* 141 FERC ¶ 61,264 at P 32 (2012), citing *Xcel Energy Services, Inc.*, 121 FERC ¶ 61,284 (2007) and *Mich. Electric Transmission Co.*, 117 FERC ¶ 61,314 (2006), *order on reh’g*, 118 FERC ¶ 61,139 (2007).

<sup>13</sup> See *ISO New England Inc.*, 173 FERC ¶ 61,270 (2020).

<sup>14</sup> ISO-NE OATT Attachment F (“Beginning in year three of the moratorium period, filings to change transmission depreciation rates shall not be subject to such moratorium. In no event shall such filings open up for review by the Commission any other provision of this Attachment F during the moratorium period.”).

<sup>15</sup> In the Audit Report, FERC Staff found that the depreciation rates that CL&P used for the Norwalk Harbor-Northport Project during the audit period were not the rates filed with and approved by the Commission. The current version of CL&P’s Appendix D to Attachment F (which was included as part of the Formula Rate Settlement) shows a depreciation rate for the Norwalk Harbor-Northport asset of 6.52%. This rate was an inadvertent error in connection with the submission of the settlement agreement. In this filing, as recommended by

- Attachment B: Redlined Tariff showing updated depreciation rates for inclusion in CL&P's Appendix D to Attachment F of the ISO-NE OATT; and
- Attachment C: List of names and addresses of persons to whom a copy of this filing has been posted.

## VI. POSTING AND SERVICE

A copy of this filing is being sent to the electric regulatory agencies for the six New England states, the New England Conference of Public Utilities Commissioners, New England Power Pool ("NEPOOL"), and ISO-NE. Service of this filing has also been sent to the NEPOL Participants, who include customers affected by this filing. It is also available for public inspection, during regular business hours, in a convenient form and place, at the offices of CL&P. Additionally, this filing is being posted on ISO-NE's website at <http://www.isone.com/participate/filings-orders/pto>.

## VII. COMMUNICATIONS

All correspondence and communications in this proceeding should be addressed to:<sup>16</sup>

Mary E. Grover, Esq.  
Thomas O. Lemon, Esq.  
Eversource Energy Service Company  
247 Station Drive, SE100  
Westwood, MA 02090  
Tel: (781) 441-8696  
Tel: (781) 441-8692  
E-mail: [mary.grover@eversource.com](mailto:mary.grover@eversource.com)  
E-mail: [thomas.lemon@eversource.com](mailto:thomas.lemon@eversource.com)

Timothy J. Ryan  
Financial Consultant, Transmission Rates  
and Revenue Requirements  
Eversource Energy Service Company  
107 Selden Street  
Berlin, CT 06037  
Tel: (860) 665-2537  
E-mail: [timothy.ryan@eversource.com](mailto:timothy.ryan@eversource.com)

Viet H.Ngo  
Steptoe & Johnson LLP  
1330 Connecticut Ave., N.W.  
Washington, DC 20036  
Tel: (202) 429-8123  
E-mail: [vnngo@steptoe.com](mailto:vnngo@steptoe.com)

---

FERC Staff and based upon the Depreciation Study prepared by Gannet Fleming, CL&P proposes a fixed depreciation rate of 2.20%. *See* Attachment B to this filing (redlined tariff record showing the proposed revision).

<sup>16</sup> CL&P respectfully requests waiver of 18 C.F.R. §385.203(b)(3) to permit more than two persons to be included on the service list.

Honorable Kimberly D. Bose

April 1, 2022

Page 6

## VIII. CONCLUSION

For the foregoing reasons, CL&P respectfully requests that the Commission accept the revised depreciation rate and tariff revisions submitted in this filing without suspension or refund requirement and grant an effective date of July 1, 2022.

Respectfully submitted,

By: Mary E. Grover

Mary E. Grover, Esq.

Eversource Energy Service Company

247 Station Drive, SE100

Westwood, MA 02090

Tel: (781) 441-8696

E-mail: [mary.grover@eversource.com](mailto:mary.grover@eversource.com)

*Attorney for*

*The Connecticut Light and Power Company*

**Exhibit No. CL&P-1**

**UNITED STATES OF AMERICA**  
**BEFORE THE**  
**FEDERAL ENERGY REGULATORY COMMISSION**

**The Connecticut Light and Power Company        )**

**Docket No. ER22-\_\_-000**

**PREPARED DIRECT TESTIMONY OF**  
**TIMOTHY J. RYAN**

**April 1, 2022**



**EXHIBITS TO DIRECT TESTIMONY OF  
TIMOTHY J. RYAN**

<b>Exhibit No.</b>	<b>Description</b>
CL&P-2	Revenue Impact Statement

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**The Connecticut Light and Power Company )**

**Docket No. ER22-\_\_\_\_-000**

**PREPARED DIRECT TESTIMONY  
OF TIMOTHY J. RYAN**

**Q. Please state your name and business address.**

A. My name is Timothy J. Ryan. My business address is 107 Selden Street, Berlin, Connecticut 06037.

**Q. By whom are you employed and in what capacity?**

A. I am employed by Eversource Energy Service Company (“Eversource Service”) as a Financial Consultant, Transmission Rates and Revenue Requirements. Eversource Service provides centralized services to its parent company, Eversource Energy, and the transmission owning public utility subsidiaries of Eversource Energy: The Connecticut Light and Power Company (“CL&P”), NSTAR Electric Company (“NSTAR”), and Public Service Company of New Hampshire (“PSNH”).

**Q. Please summarize your education and professional experience.**

A. I graduated from Georgetown University in 2009 with a Bachelor of Science degree in Business Administration, with concentrations in Accounting and Finance. Prior to my employment at Eversource Service, I worked for the Federal Energy Regulatory Commission as an Auditor in the Division of Audits and Accounting. I joined

Eversource Service and the Transmission Rates and Revenue Requirements group in 2014. I was an Analyst, a Senior Analyst, and a Manager in the group through May 2019 at which point I briefly left Eversource Service for 18 months. I rejoined Eversource Service in December 2020 as a Financial Consultant within the Transmission Rates and Revenue Requirements group. My current responsibilities include assisting in transmission rate-related FERC proceedings and filings, including the preparation and filing of various documents and exhibits related to transmission revenue requirements, rates and projects. I also assist in the coordination and implementation of transmission revenue requirements and rates for CL&P, NSTAR, and PSNH.

## **II. PURPOSE OF TESTIMONY**

### **Q. What is the purpose of your testimony?**

A. The purpose of my testimony is to show the impact on CL&P's transmission revenue requirement in connection with a proposed change to the transmission plant depreciation rate for a single asset, the Norwalk Harbor-Northport underground transmission line. As further explained in the transmittal letter for this filing, this change is being made to comply with a recommendation in the FERC Audit Report of CL&P issued on February 4, 2022 in Docket No. FA19-8-000 ("Audit Report"). In this filing, CL&P seeks the Commission's approval to update this transmission plant depreciation rate for use in calculating its annual transmission revenue requirement under Section II of the ISO New England Inc. Transmission, Markets and Services Tariff ("ISO-NE OATT").

### **Q. How are CL&P's annual transmission revenue requirements calculated under the ISO-NE OATT?**

A. CL&P calculates its transmission revenue requirements for all transmission services, including Regional Service, Local Service and Schedule 12C Costs, through the use of a single transmission formula rate contained in Attachment F to the ISO-NE OATT. This rate became effective on January 1, 2022 pursuant to a Settlement approved by the Commission in Docket No. ER20-2054.<sup>1</sup>

**Q. Are you aware that utilities must obtain Commission authorization to change prices charged for transmission services (whether determined by stated rates or formula rates) to reflect a change in depreciation rates?**

A. Yes. I understand that although not required to make a separate filing to obtain Commission approval before implementing changes in depreciation rates for accounting purposes, public utilities must obtain Commission approval to use such updated rates in calculating their annual transmission revenue requirements charged to customers for transmission service. Accordingly, in this filing, CL&P seeks Commission approval to change the transmission plant depreciation rate used for the Norwalk Harbor-Northport underground transmission line to establish its annual transmission revenue requirements for transmission service across its facilities provided under the ISO-NE OATT, pursuant to the requirements set forth in Order No. 618, *Depreciation Accounting*, FERC Stats. and Reg. ¶ 31,104 (2000).

### **III. PROPOSED DEPRECIATION RATE**

**Q. Please summarize your testimony.**

---

<sup>1</sup> See *ISO New England Inc.*, 173 FERC ¶ 61,270 (2020).

A. As stated above, to comply with a recommendation from the Audit Report, CL&P seeks Commission approval to update a single transmission plant depreciation rate used in calculating its annual transmission revenue requirements pursuant to the ISO-NE OATT. In my testimony, I discuss the impact on CL&P's annual transmission revenue requirements as a result of this proposal. I also discuss the proposed tariff revisions to CL&P's Appendix D to Attachment F of the ISO-NE OATT.

**Q. Why is CL&P updating this depreciation rate?**

A. On February 4, 2022, the Commission issued the Audit Report which found that the rate that CL&P applied to the cost of its Norwalk Harbor-Northport underground transmission line recorded in Account 358, Underground Conductors and Devices, for accounting purposes was not approved by the Commission. The Audit Report recommended that CL&P "file a depreciation study and associated depreciation rate for the Norwalk Harbor-Northport underground transmission line in a docket relating to its transmission formula rate within 60 days of issuance of the audit report."<sup>2</sup>

**Q. What is CL&P's proposed transmission plant depreciation rate for Norwalk Harbor-Northport underground transmission line?**

A. To comply with the Audit Report's recommendation, CL&P engaged Mr. John Spanos of Gannett Fleming Valuation and Rate Consultants, LLC to study the asset in question. As detailed in the Depreciation Study prepared by Mr. Spanos, Mr. Spanos determined that the appropriate depreciation rate for this asset should be 2.20%. In compliance with the Audit Report's recommendation, CL&P is now making this filing to propose a

---

<sup>2</sup> See FERC Audit Report at 32.

depreciation rate of 2.20% for the Norwalk Harbor-Northport underground transmission line.

**Q. What exhibits are included in this filing in support of the change in transmission plant depreciation expense as a result of the proposed change in the single transmission plant depreciation rate?**

- A. Exhibit No. CL&P-2 is a revenue impact statement that shows the impact on CL&P's transmission revenue requirement as a result of the proposed change in the transmission plant depreciation rate for the Norwalk Harbor-Northport underground transmission line. The Estimated 2021 Transmission Related Depreciation Expense provided in Exhibit No. CL&P-2 shows the proposed transmission plant depreciation rate of 2.20% for the Norwalk Harbor-Northport asset in Column (B) multiplied by the December 31, 2021 transmission plant balance in column (A) to show what the depreciation expense would have been for 2021 had the proposed transmission plant depreciation rate of 2.20% for this asset been in effect in 2021. The Estimated Change in 2021 Transmission Related Depreciation Expense provided in Exhibit No. CL&P-2 compares the 2021 actual depreciation expense with the depreciation expense under the proposed rate for the Norwalk Harbor-Northport underground transmission line, and provides the difference in Column (C).

**IV. EFFECTIVE DATE AND REVENUE IMPACT**

**Q. When is CL&P requesting that these changes be reflected in its transmission rates?**

A. CL&P requests that the revised depreciation rate become effective as of July 1, 2022, the first day of the first month that is 60 days after the date of the filing. CL&P notes that this rate would then be reflected in its ISO-NE OATT, Attachment F transmission rates when the 2022 actual transmission revenue requirements are trued up in accordance with the ISO-NE OATT.

**Q. What is the impact to annual transmission plant depreciation expense related to transmission service resulting from the new transmission plant depreciation rate?**

A. The estimated impact to transmission plant depreciation expense was calculated based on 2021 actual balances. As shown on Exhibit No. CL&P-2, the estimated transmission-related depreciation expense impact for CL&P that results from the updated, proposed depreciation rate is a *reduction* in CL&P's transmission revenue requirement of approximately \$215,199.

**Q. Is CL&P proposing any tariff revisions in connection with the proposal to change the transmission plant depreciation rate for Norwalk Harbor-Northport?**

A. Yes. CL&P is proposing limited tariff revisions to its Appendix D to Attachment F of the ISO-NE OATT to reflect the updated depreciation rate. Specifically, CL&P is proposing to replace the current rate with an updated rate of 2.20%.

**Q. Are you sponsoring any exhibits?**

A. Yes, in addition to my testimony, I am sponsoring Exhibit No. CL&P-2 that illustrates the revenue impact of the proposed update to CL&P's transmission plant depreciation rate on CL&P's transmission revenue requirements described in my testimony above.

**V. CONCLUSION**

**Q. Does that complete your testimony?**

**A. Yes it does.**




**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**The Connecticut Light and Power Company      )      Docket No. ER22-**

**AFFIDAVIT OF TIMOTHY J. RYAN**

I, Timothy J. Ryan, under the penalty of perjury, state that the information contained in the Prepared Testimony of Timothy J. Ryan on behalf of The Connecticut Light and Power Company is true, correct, accurate, and complete to the best of my knowledge, information and belief.

Executed this 1<sup>st</sup> day of April 2022.

  
\_\_\_\_\_  
Timothy J. Ryan

**Exhibit No. CL&P-2**

**Exhibit No. CL&P - 2**

**Summary of Estimated Change and Estimated Expense Due To Change in  
Transmission Plant Depreciation Rate for Norwalk Harbor - Northport  
Underground Transmission Line**

**The Connecticut Light and Power Company**

**The Connecticut Light and Power Company**  
**Estimated Change in 2021 Transmission Related Depreciation Expense**  
**Due to Change in Transmission Plant Depreciation Rate**

Exhibit No. CL&P-2

Line No.	FERC Account Number	FERC Account Description	(A) Actual Depreciation Expense (a)	(B) Proposed Depreciation Expense (b)	(C) = (B)-(A) Depreciation Expense Increase/ (Decrease)
1	358	Underground Conductors and Devices - Norwalk Harbor - Northport	\$ 1,758,096	\$ 1,542,897	\$ (215,199)

**Notes:**

- (a) Internal Plant Accounting Records - This depreciation expense represents 2021 actual and applies to a subset of the total balance in Account 358 that is related to the Norwalk Harbor - Northport Underground Transmission Line
- (b) Exhibit No. CL&P-2, Estimated 2021 Transmission Related Depreciation Expense Under Proposed Transmission Plant Depreciation Rate, Column (C)

**The Connecticut Light and Power Company**  
**Estimated 2021 Transmission Related Depreciation Expense**  
**Under Proposed Transmission Plant Depreciation Rate**

Exhibit No. CL&P-2

Line No.	FERC Account Number	FERC Account Description	(A) 2021 Account Balance (a)	(B) Proposed Depreciation Rate (b)	(C) = (A)*(B) Depreciation Expense
1	358	Underground Conductors and Devices: Norwalk Harbor - Northport	\$ 70,234,252	2.20%	\$ 1,542,897

**Notes:**

- (a) Internal Plant Accounting Records - This amount is a subset of the total balance in Account 358 and is related only to the Norwalk Harbor - Northport Underground Transmission Line
- (b) Exhibit No. CL&P-3 - Study from Gannett Fleming

**Exhibit No. CL&P-3**



Corporate Headquarters  
207 Senate Avenue  
Camp Hill, PA 17011  
P 717.763.7211 | F 717.763.8150

[gannettfleming.com](http://gannettfleming.com)

March 7, 2022

Ms. Lindsey A. Ekblade  
Plant Accounting  
Eversource Energy  
107 Selden Street  
Berlin, CT 06037

Dear Lindsey:

Depreciation Rate for Norwalk Harbor-Northport

Per your request, we have determined a recommended depreciation rate for transmission assets related to Norwalk Harbor-Northport Account 358.00, Underground Conductor and Devices, for Connecticut Light and Power as of December 31, 2021. The recommended depreciation accrual rate is based on the surviving plant in service and accumulated depreciation (book reserve) as of December 31, 2021. The resulting depreciation rate was based on the average service life of 50 years, survivor curve – R3 and a negative 15 percent net salvage. The survivor curve and net salvage parameters represent the most appropriate estimates for recovery of the type of assets in service and the remaining life of the location. Each parameter is established with the general understanding of the type of assets and the estimates of comparable assets within the industry. The resulting remaining life rate reflects past recovery patterns. The table on the following page sets forth the developed rate of 2.20 for the Norwalk Harbor-Northport assets as of December 31, 2021.



ACCOUNT 358.00 UNDERGROUND CONDUCTORS AND DEVICES

CALCULATED REMAINING LIFE DEPRECIATION ACCRUAL  
RELATED TO ORIGINAL COST AS OF DECEMBER 31, 2021

YEAR	ORIGINAL COST	CALCULATED ALLOC. BOOK ACCRUED	FUTURE BOOK RESERVE	BOOK ACCRUALS	REM. LIFE	ANNUAL ACCRUAL
(1)	(2)	(3)	(4)	(5)	(6)	(7)

SURVIVOR CURVE.. IOWA 50-R3  
NET SALVAGE PERCENT.. -15

2008	68,892,717.35	20,551,387	23,193,753	56,032,872	37.03	1,513,175
2010	1,341,534.95	342,802	386,877	1,155,888	38.89	29,722
	70,234,252.30	20,894,189	23,580,630	57,188,760		1,542,897

COMPOSITE REMAINING LIFE AND ANNUAL ACCRUAL RATE, PERCENT .. 37.1 2.20

Respectfully submitted,

GANNETT FLEMING VALUATION  
AND RATE CONSULTANTS, LLC

JOHN J. SPANOS  
President



## **ATTACHMENT A**

**The Connecticut Light and Power Company**  
**Appendix D to Attachment F of the ISO New England OATT**  
**Depreciation and Amortization Rates**

<b>Line No.</b>	<b>FERC Account Number</b>	<b>FERC Account Description</b>	<b>Annual Rate Percentage</b>
<b><u>I. Transmission Plant</u></b>			
1	350	Land and Land Rights	1.54%
2	352	Structures and Improvements	2.86%
3	353	Station Equipment	2.23%
4	354	Towers and Fixtures	2.21%
5	355	Poles and Fixtures	3.77%
6	356	Overhead Conductor and Devices	3.01%
7	357	Underground Conduit	1.91%
8	357	Glenbrook SS Cedar Hts SS	1.85%
9	357	Norwalk Harbor-Glenbrook	1.51%
10	357	Norwalk Harbor -Rowayton Jct	1.51%
11	357	Plumtree-Bethel	2.10%
12	357	S Meadow SW Hartford	2.02%
13	357	SW Hartford NW Hartford	2.12%
14	357	Triangle-Danbury	2.10%
15	358	Underground Conductor and Devices	1.35%
16	358	Glenbrook SS Cedar Hts SS	1.95%
17	358	Norwalk Harbor-Flax Hill	2.65%
18	358	Norwalk Harbor-Glenbrook	1.62%
19	358	Norwalk Harbor-Northport	2.20%
20	358	Norwalk Harbor-Rowayton Jct	2.20%
21	358	Plumtree-Middle River	2.17%
22	358	S Meadow SW Hartford	2.04%
23	358	SW Hartford NW Hartford	2.10%
24	358	Thames SS Montville SS	4.55%
25	358	Triangle-Middle River	2.17%
26	359	Roads and Trails	1.54%
<b><u>II. General Plant</u></b>			
27	389	Land and Land Rights	0.00%
28	390	Structures & Improvements	1.98%
29	391	Office Furniture & Equipment	6.67%
30	391	Computer Equipment	20.00%
31	392	Transportation Equipment	6.83%
32	392	Class 1 Car	12.65%
33	392	Class 2 Light Trucks	5.50%

**The Connecticut Light and Power Company**  
**Appendix D to Attachment F of the ISO New England OATT**  
**Depreciation and Amortization Rates**

<b>Line No.</b>	<b>FERC Account Number</b>	<b>FERC Account Description</b>	<b>Annual Rate Percentage</b>
34	392	Class 3 Medium Trucks	3.74%
35	392	Class 4 Heavy Trucks	3.88%
36	392	Class 5 Rolling Equipment	8.01%
37	392	Class 6 Trailers	4.40%
38	392	Electric Vehicle Charge Station	20.00%
39	392	Fleet Vehicle	33.00%
40	393	Stores Equipment	5.00%
41	394	Tools, Shop & Garage Equipment	4.00%
42	395	Laboratory Equipment	4.00%
43	396	Power Operated Equipment	0.31%
44	397	Communication Equipment-System	5.00%
45	397	Communication Equipment - GPS	20.00%
46	397	Communication Equipment Microwave	2.29%
47	398	Miscellaneous General Equipment	6.67%
48	399	Other Tangible Property	5.00%
<b><u>III. Intangible Plant</u></b>			
49	303	3 Year Life Intangible Plant	33.33%
50	303	5 Year Life Intangible Plant	20.00%

## **ATTACHMENT B**

**The Connecticut Light and Power Company**  
**Appendix D to Attachment F of the ISO New England OATT**  
**Depreciation and Amortization Rates**

<b>Line No.</b>	<b>FERC Account Number</b>	<b>FERC Account Description</b>	<b>Annual Rate Percentage</b>
<b><u>I. Transmission Plant</u></b>			
1	350	Land and Land Rights	1.54%
2	352	Structures and Improvements	2.86%
3	353	Station Equipment	2.23%
4	354	Towers and Fixtures	2.21%
5	355	Poles and Fixtures	3.77%
6	356	Overhead Conductor and Devices	3.01%
7	357	Underground Conduit	1.91%
8	357	Glenbrook SS Cedar Hts SS	1.85%
9	357	Norwalk Harbor-Glenbrook	1.51%
10	357	Norwalk Harbor -Rowayton Jct	1.51%
11	357	Plumtree-Bethel	2.10%
12	357	S Meadow SW Hartford	2.02%
13	357	SW Hartford NW Hartford	2.12%
14	357	Triangle-Danbury	2.10%
15	358	Underground Conductor and Devices	1.35%
16	358	Glenbrook SS Cedar Hts SS	1.95%
17	358	Norwalk Harbor-Flax Hill	2.65%
18	358	Norwalk Harbor-Glenbrook	1.62%
19	358	Norwalk Harbor-Northport	<del>6.52%</del> <u>2.20%</u>
20	358	Norwalk Harbor-Rowayton Jct	2.20%
21	358	Plumtree-Middle River	2.17%
22	358	S Meadow SW Hartford	2.04%
23	358	SW Hartford NW Hartford	2.10%
24	358	Thames SS Montville SS	4.55%
25	358	Triangle-Middle River	2.17%
26	359	Roads and Trails	1.54%
<b><u>II. General Plant</u></b>			
27	389	Land and Land Rights	0.00%
28	390	Structures & Improvements	1.98%
29	391	Office Furniture & Equipment	6.67%
30	391	Computer Equipment	20.00%
31	392	Transportation Equipment	6.83%
32	392	Class 1 Car	12.65%
33	392	Class 2 Light Trucks	5.50%

**The Connecticut Light and Power Company**  
**Appendix D to Attachment F of the ISO New England OATT**  
**Depreciation and Amortization Rates**

<b>Line No.</b>	<b>FERC Account Number</b>	<b>FERC Account Description</b>	<b>Annual Rate Percentage</b>
34	392	Class 3 Medium Trucks	3.74%
35	392	Class 4 Heavy Trucks	3.88%
36	392	Class 5 Rolling Equipment	8.01%
37	392	Class 6 Trailers	4.40%
38	392	Electric Vehicle Charge Station	20.00%
39	392	Fleet Vehicle	33.00%
40	393	Stores Equipment	5.00%
41	394	Tools, Shop & Garage Equipment	4.00%
42	395	Laboratory Equipment	4.00%
43	396	Power Operated Equipment	0.31%
44	397	Communication Equipment-System	5.00%
45	397	Communication Equipment - GPS	20.00%
46	397	Communication Equipment Microwave	2.29%
47	398	Miscellaneous General Equipment	6.67%
48	399	Other Tangible Property	5.00%
<b><u>III. Intangible Plant</u></b>			
49	303	3 Year Life Intangible Plant	33.33%
50	303	5 Year Life Intangible Plant	20.00%

**Attachment C**

**Service List**

Connecticut Public Utilities Regulatory Authority  
10 Franklin Square  
New Britain, CT 06051-2605  
[steven.cadwallader@po.state.ct.us](mailto:steven.cadwallader@po.state.ct.us)

Maine Public Utilities Commission  
18 State House Station  
Augusta, ME 04333-0018  
[Maine.puc@maine.gov](mailto:Maine.puc@maine.gov)

MA Department of Public Utilities  
One South Station, 2d Floor  
Boston, MA 02110  
[mark.marini@state.ma.us](mailto:mark.marini@state.ma.us)  
[peter.ray@state.ma.us](mailto:peter.ray@state.ma.us)

NH Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-2429  
[executivedirector@puc.nh.gov](mailto:executivedirector@puc.nh.gov)  
[debra.howland@puc.nh.gov](mailto:debra.howland@puc.nh.gov)

RI Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888  
[margaret.curran@puc.ri.gov](mailto:margaret.curran@puc.ri.gov)  
[herbert.desimone@puc.ri.gov](mailto:herbert.desimone@puc.ri.gov)  
[Paul.roberti@puc.ri.gov](mailto:Paul.roberti@puc.ri.gov)

Vermont Public Service Board  
112 State Street, Drawer 20  
Montpelier, VT 05620-2701  
[Ed.mcnamara@state.vt.us](mailto:Ed.mcnamara@state.vt.us)

Maria Gulluni  
ISO New England Inc.  
One Sullivan Road  
Holyoke, MA 01040-2841  
[mgulluni@iso-ne.com](mailto:mgulluni@iso-ne.com)

Gordon Van Welie  
ISO New England Inc.  
One Sullivan Road  
Holyoke, MA 01040-2841  
[gvanwelie@iso-ne.com](mailto:gvanwelie@iso-ne.com)



New England Power Pool  
c/o David Doot  
Day Pitney LLP  
City Place I, 185 Asylum St.  
Hartford, CT 06103-3499  
dtdoot@daypitney.com

Mark Vannoy, President  
New England Conference of Public Utilities  
Commissioners, Inc.  
c/o New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301-242910  
mark.vannoy@maine.gov

Harvey L. Reiter, Esq.  
Counsel for New England Conference of  
Public Utilities Commissioners, Inc.  
c/o STINSON MORRISON HECKER  
1150 18<sup>th</sup> Street, NW  
Suite 800  
Washington DC 20036-3816  
hreiter@stinson.com

N.E. Conf. of Public Utilities Commissioners  
50 State Street, Suite 1  
Montpelier, VT 05620  
director@necpuc.org  
info@necpuc.org