STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES	:	**DOCKET NO. 26-05-10** **SEPTEMBER 1, 2026**

MOTION OF CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

The Connecticut Light and Power Company d/b/a Eversource Energy (the "Company" or "CL&P") hereby moves that the Public Utilities Regulatory Authority ("PURA") grant protective treatment as described in this motion to ensure that certain confidential information provided by the Company in the above-referenced proceeding is not subject to public disclosure. As outlined below, certain information provided by the Company in response to interrogatories issued by PURA's Office of Education, Outreach, and Enforcement ("EOE") on July 31, 2026 ("EOE Set 1") and on August 7, 2026 ("EOE Set 2"), and by the Office of Consumer Counsel the ("OCC") on August 7, 2026 ("OCC Set 3"), contain confidential customer call recordings, cybersecurity information, internal audits, settlement agreement information, employee names and contact information, vendor pricing and negotiated contract terms, and banking information, which the Company does not disclose publicly.

In support of this motion, the Company states as follows:

1. The confidential information addressed in this motion includes information provided by the Company in the following attachments to interrogatories to EOE Set 1, EOE Set 2, and OCC Set 3:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
EOE-001	Attachment 1 CONFIDENTIAL	N/A – Filed as Confidential only	August 21, 2026
EOE-002	Attachment 1 CONFIDENTIAL through Attachment 14 CONFIDENTIAL	August 14, 2026	August 14, 2026
EOE-003	Attachment 1 CONFIDENTIAL through Attachment 33 CONFIDENTIAL*	N/A – Filed as Confidential only	August 14, 2026
EOE-005	Attachment 2 CONFIDENTIAL through Attachment 42 CONFIDENTIAL	N/A – Filed as Confidential only**	August 28, 2026
EOE-014	Attachment 2 CONFIDENTIAL (filed in parts 1-10)	N/A – Filed as Confidential only**	August 28, 2026
EOE-015	Attachment 1 CONFIDENTIAL	N/A – Filed as Confidential only	August 14, 2026
EOE-024	Attachment 2 CONFIDENTIAL through Attachment 9 CONFIDENTIAL	N/A – Filed as Confidential only**	August 28, 2026
EOE-026	Attachment 1 CONFIDENTIAL	N/A – Filed as Confidential only	August 14, 2026
EOE-035	Attachment 1 CONFIDENTIAL	August 14, 2026	August 14, 2026
EOE-044	Attachment 1 CONFIDENTIAL	August 14, 2026	August 14, 2026
EOE-047	Attachment 1 CONFIDENTIAL	August 21, 2026	August 21, 2026
EOE-048	Attachment 1 CONFIDENTIAL, Attachment 2 CONFIDENTIAL	August 17, 2026	August 17, 2026
EOE-054	Attachment 1 CONFIDENTIAL	August 21, 2026	August 21, 2026
EOE-057	Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL*	N/A – Filed as Confidential only	August 14, 2026
EOE-058	Attachment 1 CONFIDENTIAL	August 21, 2026	August 21, 2026

EOE-061	Attachment 1 CONFIDENTIAL*	August 14, 2026	August 14, 2026
EOE-117	Attachment 1 CONFIDENTIAL	August 14, 2026	August 14, 2026
EOE-131	Attachment 1 CONFIDENTIAL	August 21, 2026	August 21, 2026
OCC-192	Attachment 1 CONFIDENTIAL	August 24, 2026	August 24, 2026
OCC-193	Attachment 1 CONFIDENTIAL through Attachment 8 CONFIDENTIAL	N/A – Filed as Confidential only	August 28, 2026

* Certain confidential attachments to EOE-003, EOE-057, and EOE-061 are redacted for relevance.

** The bulk attachments to EOE-005, EOE-014, and EOE-024 are being provided as confidential-only for the time being, but the Company anticipates undertaking a significant bulk redaction project to provide these bulk attachments into the public record. Together, these bulk attachments contain approximately 60,000 or more pages that must be manually redacted to provide a public-facing version. The Company can provide further detail on the timeline to provide these redactions once it has engaged an outside vendor to undertake the bulk redaction project.

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on August 14, 2026, August 17, 2026, August 21, 2026, and August 28, 2026. The last item responsive to EOE Set 1 was filed with PURA on August 28, 2026, the last item responsive to EOE Set 2 was filed with PURA on September 1, 2026, and the last item responsive to OCC Set 3 was filed with PURA on August 28, 2026.

Customer Call Recordings

2. EOE-001, Attachment 1 CONFIDENTIAL is a ZIP file which includes call recordings that contain specific customer account information and customer identifying information, including customer names, account numbers, as well as financial information relating to specific customers and adjustments made to their bills. The Company does not disclose customer information, including customer calls, account numbers, or financial information of

customers to the public. Any public disclosure of the Company's customer information would harm their customers' privacy interests.

3. Connecticut law and Company policy prohibit the Company from publicly disclosing information about its customers without such customers' written consent. See, e.g., Conn. Agencies Regs. § 42-471(a) which states that "[a]ny person in possession of personal information of another person shall safeguard the data, computer files and documents containing the information from misuse by third parties." "Personal information" is defined as "information capable of being associated with a particular individual through one or more identifiers, including, but not limited to … an account number, a credit or debit card number, … and does not include publicly available information that is lawfully made available to the general public from federal, state or local government records or widely distributed media." Conn. Gen. Stat. § 42-471(c). See, also, Docket No. 98-06-13, DPUC Report to the General Assembly on Aggregation, at 12 (Dec. 23, 1998 Decision) (stating that "[c]ustomers have certain privacy rights under federal and state law that protect them from any harm that may result from unauthorized release or use of personal information.").

4. If the Company were to publicly disclose EOE-001, Attachment 1 CONFIDENTIAL, absent the consent of each affected customer, the Company could be exposed to legal claims from such customers, including but not limited to, complaints made to the Office of the Attorney General and the Connecticut Department of Consumer Protection.

5. PURA has routinely protected from public disclosure customer call recordings and account-specific information of utility customers. See, Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (May 20,

2025 Ruling on Motion No. 95) (protecting from public disclosure customer call recordings); Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend their Rate Schedules (Dec. 6, 2023 Ruling on Motion No. 23) (protecting from public disclosure customer call recordings); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Feb. 15, 2023 Ruling on Motion No. 53) (protecting as confidential recordings of customer calls); 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, (Jan. 13, 2022 Ruling to Motion No. 62) (protecting audio recordings of phone calls between the companies' customer service representatives and customers). Additionally, PURA has previously protected from public disclosure account-specific information of utility customers. See, e.g., Docket No. 22-08-08 (Oct. 6, 2022 Ruling on Motion No. 8) (protecting as confidential customer account specific information); Docket No. 20-08-03, PURA Investigation into Electric Distribution Companies' Preparation and Response to Tropical Strom Isaias (Dec. 7, 2020 Ruling on Motion No. 32) (protecting as confidential customer-specific information), (Dec. 8, 2020 Ruling on Motion No. 36) (protecting as confidential customer-specific information); Docket No. 17-05-42, Application of The Southern Connecticut Gas Company to Increase its Rates and Charges (Aug. 23, 2017 Ruling on Motion No. 9) (protecting as confidential customer and confidential contact information); Docket No. 11-02-01, Semi-Annual Reconciliation of The Connecticut Light and Power Company's and The United Illuminating Company's Federally Mandated Congestion Costs and Generation Services Charge, (April 11, 2011 Ruling on Motion No. 6) (protecting from public disclosure customer names, account numbers, usage data and billing detail).

Cybersecurity

6. EOE-002, Attachment 1 CONFIDENTIAL through EOE-002, Attachment 14 CONFIDENTIAL, and EOE-003, Attachment 1 CONFIDENTIAL through EOE-003, Attachment 33 CONFIDENTIAL include information on the Company's cybersecurity framework, including the IT security plans, and the Company's IT security evaluations. EOE-002, Attachment 1 CONFIDENTIAL through EOE-002, Attachment 14 CONFIDENTIAL, and EOE-003, Attachment 1 CONFIDENTIAL through EOE-003, Attachment 33 CONFIDENTIAL contain commercially-sensitive and non-public business information, including information describing the Company's specific cybersecurity measures that the Company does not disclose to the public. Disclosure of the Company's cybersecurity measures would reveal information about the Company's cybersecurity systems to the general public, which would provide bad actors with a means to potentially disrupt and impact the Company's system and the safe and reliable service throughout the state of Connecticut. In order to protect the Company's cybersecurity systems from such an event, EOE-002, Attachment 1 CONFIDENTIAL through EOE-002, Attachment 14 CONFIDENTIAL, and EOE-003, Attachment 1 CONFIDENTIAL through EOE-003, Attachment 33 CONFIDENTIAL should not be disclosed publicly.

7. Conn. Gen. Stat. § 1-210(b)(19), exempts from public disclosure "[r]ecords when there are reasonable grounds to believe disclosure may result in a safety risk, including the risk of harm to any person, any government-owned or leased institution or facility or any fixture or appurtenance and equipment attached to, or contained in, such institution or facility[.]" Section 1-210(b)(19) defines "government-owned or leased institution or facility" as including a "facility owned or leased by a public service company, as defined in section 16-1[.]" Conn. Gen. Stat. § 1-210(b)(20), exempts from public disclosure cybersecurity information because it constitutes

"[r]ecords of standards, procedures, processes, software and codes, not otherwise available to the public, the disclosure of which would compromise the security or integrity of an information technology system."

8. PURA has granted protective treatment to protect materials similar to the information provided in EOE-002, Attachment 1 CONFIDENTIAL through EOE-002, Attachment 14 CONFIDENTIAL, and EOE-003, Attachment 1 CONFIDENTIAL through EOE-003, Attachment 33 CONFIDENTIAL on the basis that they constitute sensitive cybersecurity information. See, e.g., Docket No 25-04-23, Petition of Office of Consumer Counsel for an Investigation of Avangrid Companies' Data Breach of Customer Information (June 2, 2025 Ruling on Motion No. 1) (protecting cybersecurity documents as confidential pursuant to Conn. Gen. Stat. § 1-210(b)(19) and (20)); Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend their Rate Schedules (Apr. 11, 2024, Ruling on Motion No. 86) (protecting cybersecurity documents as confidential pursuant to Conn. Gen. Stat. § 1-210(b)(19) and (20)).

Audits

9. EOE-003, Attachment 1 CONFIDENTIAL through EOE-003, Attachment 33 CONFIDENTIAL, and EOE-057, Attachment 1 CONFIDENTIAL through EOE-057, Attachment 7 CONFIDENTIAL provide internal audit reports for the Company. Specifically, EOE-003, Attachment 1 CONFIDENTIAL through EOE-003, Attachment 33 CONFIDENTIAL provides internal audits related to the Company's information technology. EOE-057, Attachment 1 CONFIDENTIAL through EOE-057, Attachment 7 CONFIDENTIAL, provide internal audit reports related to the Company's procurement organization, procurement applications, and related

activities, which are commercially sensitive topics. These reports contain proprietary, commercially sensitive, and non-public business information, including information analyzing and critiquing internal company business strategies and operating practices that the Company does not disclose to the public. Consistent with long-standing practice, these documents should be treated confidentially so as not to undermine the integrity of the internal audit process of the Company. The Company conducts audits and benchmarking to determine whether it has appropriate controls in place to manage its various business functions, and whether appropriate actions are taken to improve controls or address areas of concern. It is an integral part of the process for employees to provide candid assessments of the subject areas in question, and for the audit reports to provide candid self-assessments of the Company's performance. If there is a possibility that such information could be open to public inspection, the critical self-evaluation that is integral to the audit process, and the integrity of the same would be compromised. Any public disclosure of these reports would have a chilling effect on the audit process, would cause harm to the business interests of the Company in its service to customers and would allow unfair access to sensitive internal information.

10. The Company is providing EOE-003, Attachment 3 CONFIDENTIAL, EOE-003, Attachment 9 CONFIDENTIAL, EOE-003, Attachment 14 CONFIDENTIAL, EOE-003, Attachment 18 CONFIDENTIAL, EOE-003, Attachment 21 CONFIDENTIAL, EOE-003, Attachment 27 CONFIDENTIAL, EOE-003, Attachment 28 CONFIDENTIAL, EOE-003, Attachment 31 CONFIDENTIAL , EOE-003, Attachment 33 CONFIDENTIAL, EOE-057, Attachment 1 CONFIDENTIAL, EOE-057, Attachment 1 CONFIDENTIAL, EOE-057, Attachment 2 CONFIDENTIAL, EOE-057, Attachment 5 CONFIDENTIAL, and EOE-057, Attachment 6 CONFIDENTIAL as confidential-only documents that are also redacted for

relevance. Eversource considers these documents highly confidential and does not disclose them publicly. Further, they are redacted for relevance because they contain information regarding affiliates outside of Connecticut and affiliates not subject to PURA's regulation; such information is not germane to this proceeding.

11. EOE-015, Attachment 1 CONFIDENTIAL provides an audit of the Company's emergency response function. While not an internal audit report, it contains a comprehensive, top-to-bottom assessment of Eversource's ERP performed by an outside consulting firm that was originally prepared at the advice of counsel and in anticipation of litigation. Similar to the above-mentioned internal audit reports, EOE-015, Attachment 1 CONFIDENTIAL contains proprietary, commercially-sensitive, and non-public business information, including information analyzing and critiquing internal company strategies, processes, and operating practices that is maintained by the Company as confidential and is not disclosed or released to the public. EOE-015, Attachment 1 CONFIDENTIAL was previously protected by PURA as confidential as EOE-039, Attachment 5, in Docket No. 24-03-30, Investigation of the 2018-2021 Catastrophic Storm Costs Reported by The Connecticut Light and Power Company d/b/a Eversource Energy (Sept. 25, 2024 Ruling on Motion No. 21) (protecting the document pursuant to Conn. Gen. Stat. § 1-210(b)(19)).

12. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A) and (B), this information "derives economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from their disclosure or use", and is "the subject of efforts that are reasonable under the circumstances to maintain secrecy"; and this information is "[c]ommercial or financial information given in confidence, not required by statute". Conn. Gen. Stat. § 1-210(b)(19), exempts from public disclosure "[r]ecords when there are reasonable grounds to believe disclosure may result in a safety

risk, including the risk of harm to any person, any government-owned or leased institution or facility or any fixture or appurtenance and equipment attached to, or contained in, such institution or facility[.]" Additionally, Conn. Gen. Stat. § 1-210(b)(20) provides that information "the disclosure of which would compromise the security or integrity of an information technology system" is exempt from public disclosure. Neither federal nor Connecticut statutes require that the Company submit this Confidential Information to PURA.

13. PURA's July 10, 2026 Procedural Order Regarding Protected Materials issued in this docket states that internal audit reports, benchmarking analysis, and other non-public business information is typically subject to protected treatment (Procedural Order at 3). Further, PURA has previously granted protected treatment for similar requests to treat audit reports and related information as confidential. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Feb. 18, 2025 Ruling on Motion No. 43) (granting protective treatment to internal audit reports); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Jan. 12, 2023 Ruling on Motion No. 48) (granting protective treatment to audit reports and external benchmarking studies); Docket No. 18-05-16, Application of Connecticut Natural Gas Corporation to Increase its Rates and Charges (August 23, 2018 Ruling on Motion No. 12) (granting protective treatment for internal audit reports); Docket No. 17-05-42, Application of the Southern Connecticut Gas Company to Increase its Rates and Charges (August 23, 2017 Ruling on Motion No. 8) (granting protected status to Internal Audit Department reports); Docket No 13-03-23, Petition of The Connecticut Light and Power Company for Approval to Recover its 2011-2012 Major Storm Costs, (August 8, 2013 Ruling on Motion No. 9) (granting protected status to Internal Audit Department reports); Docket No. 09-12-05, Application of The Connecticut Light and Power Company to Amend Its

Rate Schedules, (April 14, 2010 Ruling on Motion No. 43) (granting confidential treatment to internal audit report). Further, some of the audits, such as EOE-003, Attachment 1 CONFIDENTIAL through EOE-003, Attachment 33 CONFIDENTIAL, and EOE-015, Attachment 1 CONFIDENTIAL, may also be protected consistent with the PURA precedent articulated in the cybersecurity section of this motion.

Employee Names and Contact Information

14. EOE-005, Attachment 2 CONFIDENTIAL through Attachment 42 CONFIDENTIAL, EOE-024, Attachment 2 CONFIDENTIAL through Attachment 9 CONFIDENTIAL, EOE-026, Attachment 1 CONFIDENTIAL, EOE-035, Attachment 1 CONFIDENTIAL, EOE-044, Attachment 1 CONFIDENTIAL, EOE-047, Attachment 1 CONFIDENTIAL, EOE-048, Attachments 1 and 2 CONFIDENTIAL, EOE-054, Attachment 1 CONFIDENTIAL, EOE-058, Attachment 1 CONFIDENTIAL, EOE-061, Attachment 1 CONFIDENTIAL, EOE-117, Attachment 1 CONFIDENTIAL, EOE-131, Attachment 1 CONFIDENTIAL, and OCC-192, Attachment 1 CONFIDENTIAL contain names and contact information for individual Eversource employees. PURA has previously protected employee names and contact information from public disclosure. In Docket No. 24-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company, PURA approved CL&P's motion for reconsideration for protection to Eversource employee names and contact information ("Docket No. 24-01-03 Motion No. 28 Ruling"). CL&P articulated the increased security risks triggered by making employee contact information publicly available. See Docket No. 24-01-03, Motion No. 28 Ruling, at 2. PURA found that the Eversource email addresses, phone numbers, and non-public addresses of certain Eversource employees were exempt from public disclosure as information that constitutes commercial or financial information

given in confidence and not required by statute. See id.; Conn. Gen. Stat. § 1-210(b)(5)(B). PURA has also previously protected employee contact information from public disclosure in other instances. See, e.g., Docket No. 26-05-10, Application of Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules (August 2, 2026 Ruling to Motion No. 10) (protecting employee names and contact information); Docket No. 24-03-01, Annual Review of the System Expansion Reconciliation Mechanisms (July 22, 2024 Ruling to Motion No. 4) (protecting employee contact information); Docket No. 21-08-24, Petition of William Tong, Attorney General for the State of Connecticut, and the Office of Consumer Counsel for an Investigation into Eversource Energy Regarding Gas Expansion Marketing (October 25, 2021 Ruling to Motion No. 7) (protecting employee names, addresses, and telephone numbers).

15. The Company is providing EOE-061, Attachment 1 CONFIDENTIAL, as a confidential-only document that is also redacted for relevance. Eversource considers this document highly confidential and does not disclose it publicly. Further, it is redacted for relevance because it contains information regarding Eversource's other utility subsidiaries; such information is not germane to this proceeding.

16. Employee names and contact information should be protected from public disclosure. If the Company makes employee information public, there are both cybersecurity and physical security risks to individual Eversource employees. Making employee information public triggers an increased risk in phishing attacks as there is more information available about Eversource employees, centralized and publicly available. Additionally, there is a risk of personal harassment for individual employees. Accordingly, this information should be protected from public disclosure pursuant to Conn. Gen. Stat. § 1-210(b)(2) as the public disclosure would constitute an invasion of personal privacy. The public disclosure of the employee information may

also result in a safety risk or a security risk to information technology systems, and therefore should be exempt from public disclosure under Conn. Gen. Stat. §§ 1-210(b)(19) and (20). Lastly, the Company is providing this commercial contact information related to its employees only as part of a regulatory filing and it is not required by statute to make this information public. Thus, the employee information qualifies for protection from public disclosure pursuant to Conn. Gen. Stat. § 1-210(b)(5)(B).

Vendor Information and Contract Terms

17. EOE-005, Attachment 2 CONFIDENTIAL through EOE-005, Attachment 42 CONFIDENTIAL, EOE-014, Attachment 2 CONFIDENTIAL, EOE-024, Attachment 2 CONFIDENTIAL through EOE-024, Attachment 9 CONFIDENTIAL, EOE-044, Attachment 1 CONFIDENTIAL, and EOE-131, Attachment 1 CONFIDENTIAL contain confidential vendor pricing information relating to the Company's third-party vendors. The pricing and rates from third parties and consultants are confidential and proprietary, and public disclosure of this data would adversely impact the third parties and consultants in their pending and future negotiations to perform like services for other companies. The information on terms, fees, and rates contained in this attachment include proprietary, competitive, and commercially sensitive information that is non-public information. Public disclosure of this information would cause substantial harm to the Company and its vendor. Negotiated contract terms, pricing, and unit cost terms obtained by the Company from vendors are provided with an expectation of privacy and must be protected from public disclosure to ensure competitive market pricing.

18. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in response to EOE-005, Attachment 2 CONFIDENTIAL, EOE-014, Attachment 2 CONFIDENTIAL through EOE-014, Attachment 42 CONFIDENTIAL, EOE-024, Attachment 2

CONFIDENTIAL through EOE-024, Attachment 9 CONFIDENTIAL, EOE-044, Attachment 1 CONFIDENTIAL, and EOE-131, Attachment 1 CONFIDENTIAL qualifies as "trade secrets" for purposes of the Freedom of Information Act. Trade secrets include "formulas, patterns, compilations, programs, devices, methods, techniques, processes…cost data…that (1) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use, and (2) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy." Conn. Gen. Stat. § 1-210(b)(5)(A); see also Conn. Gen. Stat. § 35-51(d). Moreover, PURA is permitted to protect from public disclosure "[c]ommercial and financial information given in confidence, not required by statute." Conn. Gen. Stat. § 1-210(b)(5)(B). Further, the Confidential Information provided in response to EOE-005, Attachment 2 CONFIDENTIAL, EOE-014, Attachment 2 CONFIDENTIAL through EOE-014, Attachment 42 CONFIDENTIAL, EOE-024, Attachment 2 CONFIDENTIAL through EOE-024, Attachment 9 CONFIDENTIAL, EOE-044, Attachment 1 CONFIDENTIAL, and EOE-131, Attachment 1 CONFIDENTIAL is commercial or financial information given in confidence, and not required by statute under Conn. Gen. Stat. § 1-210(b)(5)(B).

19. PURA has previously approved requests to protect similar negotiated pricing and contract information as confidential. See, Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Dec. 18, 2024 Ruling on Motion No. 5) (protecting as confidential negotiated third-party vendor pricing and agreements); Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend their Rate Schedules (Nov. 26, 2023 Ruling on Motion No. 12 and Dec. 22, 2023 Ruling on Motion No. 29) (protecting as confidential third-party

vendor agreement); Docket No. 14-07-19RE07, PURA Investigation into Redesign of the Residential Electric Billing Format – Cost Allocation Among Suppliers for System Redesign and Associated Costs (July 21, 2022 Ruling on Motion No. 3) (protecting third-party vendors' pricing data as commercially sensitive, confidential, and proprietary); Docket No. 20-08-03, Investigation into Electric Distribution Companies' Preparation for and Response to Tropical Storm Isaias (Dec. 10, 2020 Ruling on Motion No. 43) (protecting as confidential unaudited vendor invoices and pricing information); Docket No. 16-06-04, Application of the United Illuminating Company to Increase Rates and Charges (Aug. 8, 2016 Ruling on Motion No. 10) (approving motion for protective order for rate case expense); (Aug. 8, 2016 Order on Motion No. 8) (allowing confidential status for third-party vendor pricing information); (Aug. 25, 2016 Order on Motion No. 17) (protecting as confidential pricing and contract with meter reading vendor); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend Rate Schedules (July 25, 2014 Ruling on Motion No. 27) (vendor contracts for rate case expense); Docket No. 13-03-02, Petition of The Connecticut Light and Power Company for Approval to Recover its 2011 – 2012 Major Storm Costs (Apr. 10, 2013 Ruling on Motion No. 1) (third-party vendor pricing information); Docket No. 09-12-05, Application of Connecticut Light and Power Company To Amend Its Rate Schedules (Mar. 22, 2010 Ruling on Motion No. 34) (confidential vendor pricing information).

Negotiated Settlements

20. EOE-026, Attachment 1 CONFIDENTIAL, provides information relating to a settlement negotiated by the Company. This information was negotiated with adverse parties to reach a resolution of contested claims. The information contained in EOE-026, Attachment 1 CONFIDENTIAL, includes settlement amounts and terms, which are and will continue to be

maintained as confidential by the parties and will not be disclosed other than to legal counsel and in other limited circumstances. Public disclosure of this material would reveal legal and financial information that would disadvantage and cause harm to the Company in negotiating future settlements on reasonable terms. Any public disclosure of such information would be detrimental to the business interests of the Company in its service to customers.

21. It is well-established in Connecticut that, in order to promote the important public policy of encouraging parties to enter into settlement discussions and to reach settlements, courts will honor the parties' intent to protect the confidentiality of their settlement negotiations. See, e.g., Etter v. Advest, Inc., 2002 Conn. Super. LEXIS 3478 at *6 (Conn. Super. Ct. Oct. 29, 2002) (stating that there is a "privilege afforded confidential settlement communications with third parties…"); Tomasso Bros. v. Oct. Twenty-Four, Inc., 221 Conn. 194, 198, 602 A.2d 1011, 1014 (1992) ("The general rule that evidence of settlement negotiations is not admissible at trial is based upon the public policy of promoting the settlement of disputes."); Glastonbury Bank & Tr. Co. v. Corbett Constr. Co., Docket No. 521355, 1992 WL 316472, at *2 (Conn. Super. Ct. Oct. 15, 1992) (granting motion to strike special defense that deals with settlement negotiations between the parties because they are confidential and inadmissible in Connecticut); Lanier v. Hochman, 1998 Conn. Super. LEXIS 1755 at *30 fn. 3 (Conn. Super. Ct. June 19, 1998) (stating that "[t]he settlement amount, by agreement of the plaintiff and settling defendant, and approved by the court, was confidential.").

22. Section 16-1-38(a) of the Regulations of Connecticut State Agencies states that where, as here, PURA rules on an evidentiary issue, it "shall give effect to the rules of privilege recognized by law in Connecticut." As indicated above, there appears to be a public policy of encouraging parties to enter into settlement discussions and to reach settlements, where courts

have honored the parties' intent to protect the confidentiality of their settlement negotiations. See Tomasso Bros., 221 Conn. at 198.

23. Granting protected status to the settlement discussions involving litigation or potential litigation is also consistent with PURA precedent. For example, in Docket No. 07-07-01, PURA granted a request to protect from public disclosure a confidential settlement of litigation with another party. See Docket No. 07-07-01, Application of The Connecticut Light and Power Company To Amend Rate Schedules, January 8, 2008 Letter Order Granting Motion No. 37 at Page 1.[1] More recently, in Docket No. 16-03-08RE01, PURA granted a request to protect from public disclosure a settlement of litigation with four other parties. See Docket No. 16-03-08RE01, Petition of Windham Solar LLC for Approval of a Power Purchase Agreement Between Windham Solar LLC and The Connecticut Light and Power Company d/b/a Eversource Energy – Voluntary Remand, June 11, 2020 Ruling on Motion No. 10 at 1;[2] see also Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Jan. 23, 2025 Ruling to Motion No. 25) (granting protective treatment to a confidential settlement amount); Docket No. 16-06-04, Application of The United Illuminating Company to Increase Rates and Charges (Sept. 1, 2016 Ruling on Motion No. 21) (protecting as confidential negotiated settlement agreement amounts and information); Docket No. 09-12-05, Application of The Connecticut Light

[1] Page 1 of the January 8, 2008 letter order approving Motion No. 37 in Docket No. 07-07-01 states, in relevant part: "The Department of Public Utility Control (Department) is in receipt of the January 8, 2008 Motion of The Connecticut Light and Power Company (CL&P) to Amend the Protective Order in this docket. The Motion to Amend is to protect from public disclosure a confidential Settlement Agreement between CL&P and NRG concerning NRG's station service receivable and discussion as to how it would affect the amount of rate relief requested in this proceeding. The Department hereby grants the Motion."

[2] "The Public Utilities Regulatory Authority (Authority) acknowledges receipt of a motion for protection filed by The Connecticut Light and Power Company d/b/a Eversource Energy (Company), dated June 5, 2020. In that motion, the Company requests protected treatment for the confidential litigation settlement summary in Exhibit 1 to the June 5, 2020 Joint Motion to Approve the Litigation Settlement filed in the above-captioned docket. The Authority hereby grants the Company's motion. Said materials shall be maintained in a locked file available for viewing only by members of the Authority's staff and Commissioners."

and Power Company To Amend Its Rate Schedules (Apr. 1, 2010 Ruling on Motion No. 40; Feb. 20, 2010 Ruling on Motion No. 20) (protecting settlement agreements between Department of Revenue Services and utility).

Proprietary Reports

24. OCC-193, Attachment 1 CONFIDENTIAL through Attachment 8 CONFIDENTIAL, provide confidential and proprietary reports, which were received through paid subscriptions of Eversource Energy. Specifically, OCC-193, Attachment 1 CONFIDENTIAL through Attachment 8 CONFIDENTIAL, contain entirely confidential, third-party compensation survey reports provided to the Company through subscription-based data services and platforms, which allow subscribing customers access to various proprietary documents, in exchange for a subscription fee. The Company has subscriptions to receive these reports.

25. As part of its subscriptions, it is required the recipients maintain as confidential and proprietary all data, materials, and publications it receives from its subscriptions and not to release publicly the databases or publications or any of the material contained in them. All vendors operate under a business model, which is to provide data access and publications to persons that purchase subscriptions for a fee. This subscription business model is based on the expectation that only paying subscribers will have access to the databases and publications. If the survey data and reports in OCC-193, Attachment 1 CONFIDENTIAL through Attachment 8 CONFIDENTIAL, were disclosed to the general public, it would violate the terms of the Company's subscriptions and harm the vendor's business interests because individuals and entities that seek access to this information would be able to access it without having to pay for a subscription. This would harm the Company, and its provider, because it could limit future access to the subscription databases and financial publications due to potential competitive disadvantages that could arise, which would

deprive the Company of information vital to conducting its business. Therefore, the Company is submitting these documents as confidential only.

26. In prior proceedings, PURA has protected from public disclosure proprietary and confidential databases and data developed and maintained by third-party vendors with the expectation that only paying subscribers and customers would have access to that information, in recognition of the data's substantial commercial value. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (March 5, 2025 Ruling to Motion No. 51) (granting confidential treatment to investor analyst reports filed in confidential only version); Docket No. 17-12-03RE11, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review (March 11, 2021 Ruling on Motion No. 12) (approving confidential treatment for non-public subscription-based data); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend its Rate Schedules (July 22, 2014 Letter Order granting Motion No. 25) (protecting from public disclosure survey data from a third-party vendor whose business plan is to provide access to the data only to paying subscribers); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend its Rate Schedules (September 19, 2014 Letter Order granting Motion No. 43) (protecting from public disclosure information provided in response to Q-LF-12 from a third-party vendor's confidential database).

27. The Confidential Information is maintained by the Company as confidential and has not been disclosed or released to the public.

28. The Confidential Information is exempt from disclosure under Conn. Gen. Stat. §1-210(a) and (b), as described herein.

29. Additionally, pursuant to PURA's July 10, 2026 Procedural Order Regarding Protected Materials in this docket, the Confidential Information is the type of information that is typically subject to protected treatment, including customers' individually identifiable information, confidential legal settlement information, internal audit reports, employee names and email addresses, and commercial terms and pricing information.

30. In this case, the necessity of withholding public disclosure of the Confidential Information outweighs the public interest in such disclosure.

31. Attached in support of this motion as Attachment A, is the Affidavit of Casandra Dickson, Director of Regulatory Projects and Compliance for Eversource Energy Service Company. The affidavit addresses the need for protective treatment of the Confidential Information described in this motion.

32. For the foregoing reasons, CL&P respectfully requests that PURA grant this motion for protective order.

RESPECTFULLY SUBMITTED,

THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY

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CERTIFICATION

I hereby certify that on September 1, 2026, a copy of the foregoing was sent to the Public Utilities Regulatory Authority, the Office of Consumer Counsel, and to the official service list in this proceeding in Compliance with Conn. Regs. §16-1-15, as amended.

S. Pardee

Sarah A. Pardee
Commissioner of the Superior Court