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 15, 2026

RESPONSE OF CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY TO ALLCO FINANCE LIMITED OPPOSITION TO MOTION FOR PROTECTIVE TREATMENT

I. INTRODUCTION

The Connecticut Light and Power Company d/b/a Eversource Energy (the "Company" or "CL&P") hereby responds to the objection of ALLCO Finance Limited ("ALLCO") to the Company's Motion for Protective Treatment, docketed by the Public Utilities Regulatory Authority ("PURA") as Motion No. 45. Motion No. 45 requested that PURA grant protective treatment to ensure that certain confidential information provided by the Company in the above-referenced proceeding is not subject to public disclosure. The confidential information filed by the Company was submitted pursuant to interrogatories issued by PURA on August 19, 2026 ("PURA Set 2"), and by the Office of Consumer Counsel the ("OCC") on August 11, 2026 ("OCC Set 4") and on August 12, 2026 ("OCC Set 5"). The Company sought protection for these items because the information submitted to PURA encompasses Critical Energy Infrastructure Information ("CEII")[1], proprietary consultant materials, internal audits, settlement agreement

[1] 18 C.F.R. § 388.113(c)(2) defines CEII: "Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that" (i) Relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) Could be useful to a person in planning an attack on critical infrastructure; (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552; and (iv) Does not simply give the general location of the critical infrastructure."

information, employee and vendor names and contact information, third-party pricing and negotiated contract terms, and banking information which the Company does not disclose publicly.

On July 10, 2026, PURA issued a Procedural Order Regarding Protected Materials ("Procedural Order"). In that Procedural Order, PURA delineated the types of information that will be protected in this proceeding. Specifically, PURA identified the "Information that May Be Redacted Prior to the Authority's Review," as follows:

1. Customers' individually identifiable information (e.g., names, phone numbers, utility account numbers, bank account information, email addresses, and physical addresses);
2. Contract terms whose disclosure would negatively impact the filer's business position or the business position of an entity with which it has a contractual relationship (e.g., special negotiated contract terms including pricing, unit cost information, and commercial terms);
3. Confidential legal settlement information, which includes amounts of individual claims;
4. Records for which there is a reasonable basis to believe disclosure may result in a safety risk to a person or a government-owned or leased institution, including an institution or facility owned or leased by a public service company, (e.g., critical energy infrastructure);
5. Confidential cybersecurity information whose disclosure may result in a safety or security risk;
6. Employee names, personal email addresses, personal physical addresses, and personal identification numbers, as well as personnel and medical information, the disclosure of which would constitute an invasion of personal privacy
7. Internal audit reports, benchmarking analyses, and other non-public business information, including information analyzing and critiquing internal company business strategies and operating practices;
8. Internal bid evaluation processes and procedures;
9. Tax returns and related tax information;
10. Confidential and proprietary formulae; and
11. Strategic discussions in meeting minutes, (e.g., board of director discussion regarding awarding contracts to vendors, commercially sensitive discussions regarding affiliates, and confidential financial information).

(Procedural Order at 3).

The information filed by the Company and subject to the Company's request for protective treatment falls within PURA's delineated items, as follows:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date	Corresponding Number(s) in Procedural Order
OCC-276	Attachment 1 CONFIDENTIAL	August 25, 2026	August 25, 2026	1, 6
OCC-307	Attachment 1 CONFIDENTIAL through Attachment 52 CONFIDENTIAL*	N/A – Filed as Confidential only	September 1, 2026	7
OCC-308	Attachment 1 CONFIDENTIAL	September 1, 2026	September 1, 2026	3
OCC-346	Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL	September 4, 2026	September 4, 2026	1, 2, 4, 6
OCC-365	Attachment 14 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026	10
OCC-365	Attachment 15 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026	10
OCC-365	Attachment 16 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026	10
OCC-365	Attachment 18 CONFIDENTIAL	September 1, 2026	September 1, 2026	10
OCC-365	Attachment 19 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026	10
OCC-365	Attachment 24 CONFIDENTIAL	September 1, 2026	September 1, 2026	10

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date	Corresponding Number(s) in Procedural Order
OCC-365	Attachment 33 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026	10
OCC-366	Attachment 2 CONFIDENTIAL	August 28,2026	August 28,2026	1, 2, 6
OCC-366	Attachment 3 CONFIDENTIAL	August 28,2026	August 28,2026	1, 6
OCC-376	Attachment 2 CONFIDENTIAL	August 28,2026	August 28,2026	1, 2, 6
OCC-384	Attachment 1 CONFIDENTIAL	August 28,2026	August 28,2026	1, 2, 6
OCC-391	Attachment 1 CONFIDENTIAL	August 28,2026	August 28,2026	1, 2, 6
OCC-394	Attachment 2 CONFIDENTIAL	September 2, 2026	September 2, 2026	1, 6
RRU-004	Attachment 1 CONFIDENTIAL	September 2, 2026	September 2, 2026	1, 6

* Certain confidential attachments to EOE-307 are redacted for relevance.

Together, these documents are referred to in Motion No. 45 as the "Confidential Information." The Confidential Information was submitted to PURA via email on August 25, 2026, August 28, 2026, September 1, 2026, September 2, 2026, and September 4, 2026. The last item responsive to PURA Set 2 was filed with PURA on September 2, 2026; the last item responsive to OCC Set 4 was filed with PURA on September 4, 2026; and the last item responsive to OCC Set 5 was filed with PURA on September 2, 2026.

On September 8, 2026, ALLCO filed an objection to Motion No. 45, specifically challenging the confidentiality of OCC-307, Attachments 1 through 52 (Internal Audit Reports); OCC-346, Attachments 1 through 7 (Project Authorizations Forms containing CEII); OCC-365, Attachments 14, 15, 16, 18, 19, 24, and 33 (Consultant's Proprietary Workpapers); and OCC-308,

Attachment 1 (Negotiated Settlement) (the "ALLCO Objection"). For the reasons discussed below, ALLCO's arguments are unpersuasive, unsupported, and should be rejected by PURA.

A. OCC-307: Internal Audits

ALLCO argues that the Company violated PURA's procedural rules by submitting confidential-only audit reports without public redacted versions or a proper motion showing extraordinary circumstances that justify submitting a "bulk" filing on a confidential-only basis (ALLCO Objection at 2). ALLCO further argues that CL&P has made unauthorized redactions based on relevance, preventing PURA and other parties from accessing the documents (id.). ALLCO therefore requests that PURA direct the Company to file full, unredacted audit reports (id. at 2-3).

As an initial matter, ALLCO mischaracterizes the basis for the Company's request to protect the internal audit reports in their entirety. The Company is not seeking to file the reports on a confidential-only basis because the documents are filed "in bulk," but rather, because of the nature of the reports themselves. As discussed in Motion No. 45, audit results are strictly maintained for internal use to evaluate and enhance the Company's performance and are not disclosed publicly. Safeguarding this information is critical to fostering open and honest self-assessments, which is necessary for the Company to obtain candid feedback and make meaningful improvements. These reports contain proprietary, commercially sensitive, and non-public business information, including information analyzing and critiquing internal company business strategies, operating practices, and systems that the Company does not disclose to the public.

The Company designs its internal audits to encourage open disclosure and uphold the integrity of the review process. This strategy allows the Company to uncover and collect information that may otherwise be inaccessible. Publicly releasing information generated through

internal analysis or audits could discourage participation and significantly reduce the value and effectiveness of these reviews. Therefore, confidential treatment of audit results is essential to securing complete, accurate, and reliable information in the Company's internal assessments. In addition, the documents are not susceptible to redaction given that every part of the document pertains to the audit parameters and outcome.

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). There is no basis for PURA to depart from this precedent in this case.

Regarding ALLCO's objection to redactions based on relevance, the Company has not redacted information concerning CL&P's regulated operations, information necessary for PURA to evaluate matters within its jurisdiction, or information necessary for PURA and the parties to evaluate CL&P's filing in this proceeding. Rather, the Company has redacted information that pertains to entities outside PURA's regulatory jurisdiction and that has no bearing on the issues presented in this proceeding. There is no basis for requiring disclosure of affiliate information merely because it happens to appear in an internal audit report that has otherwise been produced. ALLCO's categorical demand for disclosure of all information contained in the Company's audit reports is neither necessary nor appropriate.

B. OCC-308: Negotiated Settlements

ALLCO asserts that while courts respect confidentiality in settlement negotiations, settlement amounts cannot be withheld from regulatory review when cost recovery from ratepayers is involved (ALLCO Objection at 4). ALLCO argues that if a settlement affects the Company's revenue requirement, it must disclose those amounts to the regulatory authority and involved parties (id. at 5).

ALLCO's argument presumes that if a settlement cost is reflected in the Company's cost of service, that automatically entitles ALLCO to obtain the underlying settlement agreement and its terms. ALLCO cites no authority for this proposition because none exists, and its argument improperly conflates the relevance of a settlement-related expense to ratemaking with a right to obtain otherwise confidential settlement information. The Company does not waive the protected status of settlement terms merely by seeking recovery of an expense.

As discussed in Motion No. 45, OCC-308, Attachment 1 CONFIDENTIAL contains settlement amounts, which the parties maintain as confidential and will continue to maintain as confidential, and will not disclose except 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.

Connecticut courts have long held that, to promote the public policy of encouraging parties to enter settlement discussions and reach settlements, courts will honor parties' intent to protect the confidentiality of 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.").

Section 16-1-38(a) of the Regulations of Connecticut State Agencies provides that when PURA addresses an evidentiary issue, it "shall give effect to the rules of privilege recognized by law in Connecticut." As discussed above, Connecticut public policy encourages parties to engage

in settlement discussions and reach settlements. Courts have consistently honored parties' intent to maintain the confidentiality of settlement negotiations. See Tomasso Bros., 221 Conn. at 198.

PURA's July 10, 2026 Procedural Order Regarding Protected Materials issued in this docket states that confidential legal settlement information, which includes amounts of induvial claims, is typically subject to protected treatment (Procedural Order at 3). Additionally, affording protected status to settlement discussions related to litigation or potential litigation is consistent with established 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. 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; 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 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). There is no reason to depart from PURA's well-established and long-standing precedent here.

C. OCC-346: CEII in Project Authorization Documents

ALLCO claims that the Company has excessively designated information as CEII in its project authorization documents (ALLCO Objection at 3). ALLCO argues that only truly sensitive engineering and security details should be redacted, while ordinary commercial information should remain public (id.). ALLCO further contends that PURA should deny the Company's request to reconsider releasing public copies of the PAFs, which contain substantial CEII (id. at 4).

ALLCO understates the importance of protecting CEII and the security risks associated with disclosure. The information at issue is not merely ordinary commercial information, nor even is representative of the Company's internal project documentation for completed infrastructure projects. Rather, the documentation at issue concerns the configuration, operation, vulnerabilities, and performance of critical electric infrastructure that is in the planning stages and has no part of the infrastructure known to the public. The security of critical infrastructure depends not only upon protecting the physical assets themselves, but also upon controlling access to information that reveals their vulnerabilities, configurations, or other characteristics that could compromise those protections. The public interest strongly favors protecting CEII because the energy system's security and reliability directly affect public safety.

Well-documented, ongoing threats to the Nation's electric infrastructure underscore the need to protect the CEII information at issue. The Federal Energy Regulatory Commission ("FERC") has expressly recognized that cyberattacks can remotely interfere with electric systems and pose real threats to the physical operation of the grid. FERC has also recognized that physical

attacks against electric infrastructure are a real threat. In its Summer Energy Market and Electric Reliability, issued in May 2025, FERC staff stated:

> The threat of physical and cyberattacks on the grid continue to pose a concern in summer 2025, especially at times when the electric grid could be under stress due to higher electricity demand and extreme temperatures. Attacks that compromise substations or transmission infrastructure could exacerbate supply constraints, leading to localized outages or even cascading failures.
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> Physical and cyber security attacks on the electric grid have been on the rise, highlighting vulnerabilities in critical infrastructure. Physical attacks often involve vandalism, sabotage or other destructive actions aimed at disrupting power delivery and have increased significantly over the past six years. Incidents like the December 2022 attack on a substation in Moore County, North Carolina can cause widespread outages and highlight the importance of physical security measures. A 2025 Department of Homeland Security report highlights an increasing trend in these activities.
>
> On the cyber front, threats have become more sophisticated, targeting the digital systems that control electric grid operations. In 2023, NERC reported a growing number of cyber incidents, including attempts to compromise electronic security perimeters and access control systems.
>
> Another report indicates that cyberattacks against U.S. utilities surged 70% in 2024. These attacks seek to exploit vulnerabilities in interconnected systems, posing risks to electric reliability.

FERC, Summer Energy Market and Electric Reliability Assessment 2025, at 15-16 (May 15, 2025), available at https://www.ferc.gov/media/2025-summer-energy-market-and-electric-reliability-assessment (footnotes omitted). These findings reinforce that the risks associated with disclosure of CEII are not hypothetical.

PURA has similarly recognized the importance of protecting CEII, stating in its Cybersecurity Action Plan that:

> Several national officials and cybersecurity experts have warned of the increased sophistication of cyber attack tools and systems, broader range of threats and more thorough penetration of public utilities as well as other sectors such as finance, industry and communications. In February 2016 the U.S. Department of Homeland Security warned U.S. power companies that the technology deployed in shutting down parts of the power grid in the Ukraine in December 2015 confirmed that cyber attacks could disable American utilities. Admiral Michael Rogers, Director of the

> National Security Agency and head of the United States Cyber Command, warned in March 2016 that what he termed the "wellcrafted attack" led to the conclusion that at some point the United States will see such action against critical infrastructure in our country.

Connecticut Public Utilities Cybersecurity Action Plan, Docket No. 14-05-12, PURA Cybersecurity Compliance Standards and Oversight Procedures, at 1 (April 6, 2016). The risks identified by PURA provide additional context for why information that could facilitate the identification or exploitation of vulnerabilities should be protected.

The concerns described above are directly implicated by the information at issue here. As discussed in Motion No. 45, the redacted CEII information includes detailed descriptions of system configurations, including information concerning how particular circuits are supplied and the customers or load served by those circuits; descriptions of system vulnerabilities; and circuit-specific performance and loading information. Such information viewed individually and collectively can provide insight into the configuration, operational characteristics, vulnerabilities, and potential consequences of disruption to portions of the electric system. Disclosure of this information could provide useful information to a person seeking to identify, assess, or exploit vulnerabilities in critical electric infrastructure, or to maximize the consequences of a physical or cyber disruption. In addition, because these particular projects are not yet completed, the Company has followed PURA's protocol for confidentiality in relation to non-wires solutions, which recognizes the additional concerns where a project is in the conceptual stages.

PURA's July 10, 2026 Procedural Order Regarding Protected Materials issued in this docket states that CEII is typically subject to protected treatment (Procedural Order at 3). Moreover, PURA has previously recognized in motions rulings that CEII warrants confidential treatment and these decisions further support maintaining the confidentiality of the CEII in this case. See Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource

Energy to Amend Its Rate Schedules, (December 18, 2024 Ruling to Motion No. 5) (protecting as confidential Yankee's CEII); Docket No. 16-06-04, Application of The United Illuminating Company to Increase Rates and Charges (August 9, 2016 Order on Motion No. 10) (protecting as confidential critical energy infrastructure information); Docket No. 13-01-19, Application of The United Illuminating Company to Increase Rates and Charges (Apr. 16, 2013 Order on Motion No. 9; Apr. 30, 2013 Order on Motion No. 13) (protecting as confidential critical energy infrastructure information).

D. OCC-365: Consultant Workpapers

ALLCO contends that the Company cannot seek protection for expert workpapers on the basis that the witness's "know-how" is proprietary (ALLCO Objection at 4). According to ALLCO, because the workpapers support testimony recommending a 10.25 percent ROE, the underlying models, inputs, and calculations must be made available for meaningful scrutiny—including in native Excel format with formulas intact (id.).

ALLCO presents a strawman version of the argument advanced in the Company's Motion. The Company did not assert that the files should be protected simply because witness "know how" is proprietary. As discussed in Motion No. 45, the Company seeks protection of the consultants' workpapers because they contain the intellectual property and trade secrets of the Company's consultants. Although the output of these models is not confidential, the proprietary models underlying the computations are confidential and should be protected because they contain sensitive proprietary and commercially confidential information that, if publicly disclosed, would reveal competitively sensitive information to other parties and could seriously harm the competitive position of the Company's consultants. Such a result would be contrary to the public interest.

If PURA were to require public disclosure of this competitively sensitive and proprietary information in this docket, the Company (and other utilities in the Connecticut) would likely experience substantial difficulty in future negotiations with potential contract partners, particularly in obtaining third-party experts willing to conduct independent analyses that are not readily replicable by the Company. A decision to publicly disclose the consultants' proprietary models in this proceeding would put potential expert consultants on notice that their proprietary information may be disclosed to business competitors or other entities seeking access to that information without appropriately compensating the consultants. As a result, PURA's decision would have a chilling effect on the Company's ability to: (1) attract contract partners who may be reluctant to provide services if PURA may ultimately release proprietary algorithms, analyses, and information to their business competitors or potential clients; and (2) secure competitive pricing from contract partners for the benefit of the Company's customers.

PURA's July 10, 2026 Procedural Order Regarding Protected Materials issued in this docket states that confidential and proprietary formulae are typically subject to protected treatment (Procedural Order at 3). Additionally, PURA has consistently protected commercially sensitive and proprietary databases, models, and algorithms from public disclosure, recognizing that disclosure of such information could seriously undermine a company's ability to retain expert consultants and, in turn, impair its ability to ensure that customers benefit from decisions informed by the results of the consultant's work product. 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); Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend Its Rate Schedules, (December 18, 2024 Ruling to Motion No. 5) (protecting LEI's similar models filed in CL&P's affiliate's recent rate case); Docket No. 23-08-32, Application of the Connecticut Water Company to Amend Its Rate Schedule (November 16, 2023 Ruling on Motion No. 11) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Oct. 18, 2022 Ruling on Motion No. 18) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 22-07-01, Application of Aquarion Water Company of Connecticut to Amend its Rate Schedules (Sept. 9, 2022 Ruling on Motion No. 7) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 18-08-14RE01, PURA Review of the Combined Heat and Power Project Solicitation Pursuant to Conn. Gen. Stat. § 16-258e (September 20, 2022 Ruling to Motion No. 2) (protecting the excel spreadsheets containing model formula and inputs developed by a third party consultant) (see also August 10, 2022 Ruling to Motion No. 29 in the originating docket, Docket No. 18-08-14); Docket No. 14-05-06, Application of The Connecticut Light and

Power Company to Amend Rate Schedules (Sept. 19, 2014, Ruling on Motion No. 43) (protecting third-party consulting firm's confidential and proprietary database of industry statistics developed and maintained by the consulting firm). There is no reason for PURA to depart from this longstanding precedent here.

II. CONCLUSION

For the foregoing reasons, and the reasons stated in Motion No. 45, CL&P respectfully requests that PURA grant Motion No. 45.

RESPECTFULLY SUBMITTED,

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

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CERTIFICATION

I hereby certify that on September 15, 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