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**
		NOVEMBER 2, 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 on September 29, 2026 ("PURA Set 9") contain employee names, settlement agreement information, confidential Requests for Proposals ("RFPs") and bid evaluations, 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 in PURA Set 9:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
RSR-033	Attachment 2 CONFIDENTIAL Attachment 4 CONFIDENTIAL	October 16, 2026	October 16, 2026
RSR-037	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 14, 2026	October 14, 2026
RSR-038	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL Attachment 4 CONFIDENTIAL	October 20, 2026	October 20, 2026

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on October 14, 2026; October 16, 2026; and October 20, 2026. The last response to PURA Set 9 was filed with PURA on October 30, 2026.

Employee Names and Contact Information

2. RSR-038, Attachments 1, 2, and 4 CONFIDENTIAL, contain names and contact information for individual Eversource employees. 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.

3. This information is protected from public disclosure pursuant to Item 6(f) of PURA's Revised Procedural Order and 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). PURA has protected employee names and contact information from public disclosure in

this docket. See, Docket No. 26-05-10, Aug. 3, 2026 Ruling on Motion No. 10 at 5-6, and Docket No. 26-05-10, Sept. 10, 2026 Ruling on Motion No. 32.

4. PURA has previously protected employee names from public disclosure pursuant to Conn. Gen. Stat. § 1-210(b)(5)(B) ("Commercial or financial information given in confidence, not required by statute."). 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 of Eversource employee names and contact information pursuant to Section 1-210(b)(5)(B). Docket No. 24-01-03 (July 16, 2024 Ruling on Motion No. 28 at 2); see also 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 (Oct. 25, 2021 Ruling to Motion No. 7) (protecting employee names, addresses, and telephone numbers).

Confidential Requests for Proposals and Bid Evaluations

5. RSR-033, Attachments 2 and 4 CONFIDENTIAL, contain specific term and condition information provided to Eversource for services to be rendered in response to the Company's RFP. The Confidential Information in RSR-033, Attachments 2 and 4 CONFIDENTIAL, includes information provided by the Company's outside vendors, which if disclosed to the public and competitors would cause substantial harm to the Company and to its vendors. This information includes proprietary, competitive, and commercially sensitive information. RSR-033, Attachments 2 and 4 CONFIDENTIAL, also includes confidential terms and conditions that are not disclosed publicly. This information has been anonymized to protect the confidentiality of the vendor bids.

6. Additionally, RSR-033, Attachment 4 CONFIDENTIAL, provides evaluation of the vendor bids provided in response to the RFP. These attachments include the Company's evaluation of the vendor bids, including the Company's internal technical analysis of each bidder and the quality of each bid submitted as well as internal classification of the bids. The Company's internal RFP evaluation process is confidential and, if disclosed, may impact the Company's ability to secure services from competent vendors at competitive rates, which in turn would impact customers. Potential bidders should not have access to the Companies' evaluation criteria and processes, because such access would provide them an advantage in the evaluation process, potentially skewing the results and content of proposals. In maintaining its evaluation criteria as confidential, the Company is assured that potential bidder proposals are based on the market and the bidder's qualifications.

7. Pursuant to Items 6(b) and 6(h) of the Revised Procedural Order as well as Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in RSR-033, Attachments 2 and 4 CONFIDENTIAL, qualifies as "trade secrets" for purposes of the Freedom of Information Act ("FOIA"). 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).

8. PURA has previously granted similar requests related to vendor bids, negotiated contract terms, and bid evaluations. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend Its Rate Schedules (May 28, 2025 Ruling on Motion No. 98) (protecting pricing and contract information in RFPs, as well as bid evaluations); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Jan. 12, 2023 Ruling on Motion No. 48) (protecting as confidential an electric distribution company's ("EDC") internal evaluations of vendor responses to RFPs); 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 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 information related to an EDC's 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) (relating to confidentiality for 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) (relating to confidentiality for 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) (relating to confidential vendor pricing information).

Negotiated Settlements

9. RSR-037, Attachments 1 and 2 CONFIDENTIAL, provide information relating to settlements negotiated by the Company. This information was negotiated with adverse parties to reach resolutions of contested claims. The information contained in RSR-037, Attachments 1 and 2 CONFIDENTIAL, includes settlement amounts, 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.

10. Pursuant to Item 6(c) of the Revised Procedural Order, the redacted information in RSR-037, Attachments 1 and 2 CONFIDENTIAL, is eligible for protection in this proceeding as confidential legal settlement information.

11. 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 n. 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.").

12. 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 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.

13. 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 (Jan. 8, 2008 Ruling on 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

[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."

(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 on 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).

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

15. The Confidential Information is exempt from disclosure under Conn. Gen. Stat. §1-210(b) and Conn. Gen. Stat. §§ 1-210(b)(2), (5)(A), (5)(B), (b)(19), and (b)(20), as described herein.

16. Additionally, pursuant to the Revised Procedural Order, the Confidential Information is the type of information that is typically subject to protected treatment, specifically employee names.

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

---

[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."

18. 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.

19. 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

By: *Vincent P. Pace*

Vincent P. Pace
Daniel T. Crisp
Lauren H. Bidra
Eversource Energy
P.O. Box 270
Hartford, CT 06410-0270
Phone: 860-665-5426
Vincent.Pace@eversource.com
Daniel.Crisp@eversource.com
Lauren.Bidra@eversource.com

By: S. Pardee

Sarah A. Pardee
Keegan Werlin LLP
1 Liberty Square, 3rd Fl.
New Britain, CT 06051
Phone: (617) 951-1400
SPardee@keeganwerlin.com

Its Attorneys

CERTIFICATION

I hereby certify that on November 2, 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