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VIA ELECTRONIC FILING

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 26-05-10 – Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules – CL&P's Response to OCC's Comment on Motion No. 39

Dear Attorney Gaudiosi:

On behalf of the Connecticut Light and Power Company d/b/a Eversource Energy (the "Company" or "CL&P"), this letter responds to a recent objection from PURA's Office of Education, Outreach and Enforcement ("EOE"), dated September 8, 2026 (the "Objection"), which comments on the Company's Motion No. 39. Motion No. 39 requested protective treatment for certain information provided by the Company in response to interrogatories issued by 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"). In the Objection, EOE objects to "the Company's blatant disregard for the Authority's Procedural Order Regarding Protected Materials (July 10, 2026) ("Procedural Order") requiring parties to file a motion for protective order '[n]o later than two days after responses to a set of interrogatories are due'" (Objection, at 1). In addition, EOE objects to the Company's request to file "confidential only" documents, i.e. without any corresponding public redacted versions (id.). EOE further objects to Eversource's "redaction for relevance" of documents (id., at 2).

The Company is striving to adhere to the administrative process set forth in the afore-mentioned Procedural Order, as closely as humanly possible. EOE asserts that the Company improperly filed the motion "days, and in some cases weeks, after the interrogatory responses were filed in violation of Procedural Order." (id., at 1). The Company notes that, while EOE has provided a quote from the Procedural Order providing that motions are to be filed "[n]o later than two days after responses to a set of interrogatories are due," EOE has improperly cherry-picked this phrase, leaving out the rest of the sentence, as well as the following sentence. Looking to the rest of the sentence, the Company is required to provide a "***single*** motion for a protective order that addresses all requests for confidential treatment of responses to that set of interrogatories"

(Procedural Order at 1, emphasis added). Further, "[i]f the time to respond to a portion of a set of interrogatories is extended, the motion for a protective order shall be filed no later than two days ***after the latest due date for any portion of that set***." (id., emphasis added). The Company filed a Motion for Extension of time for certain responses in EOE Set 1, EOE Set 2, and EOE Set 3 on August 18, 2026, which was docketed as Motion No. 29. In Motion No. 29, the Company requested an extension of time for OCC-193, 195, 198, 200, 201, 202, and EOE-005, 014, 023, 024, 123, 124, 125, and 126, thereby moving the response deadline to August 28, 2026 (Motion No. 29, at 1). PURA granted Motion No. 29 on August 24, 2026. Therefore, the time to respond to a portion of each of EOE Set 1, EOE Set 2, and EOE Set 3 was extended until August 28, 2026. The Company was therefore required to file the Motion for Protective Treatment of Information for each of these three sets two business days after August 28, 2026. The Company properly filed the motion as Motion No. 39, on September 1, 2026.

EOE also objects to the Company's request to file certain documents confidentially, without a corresponding public redacted version. The authority cited by EOE refers to the need to file redacted versions specific to bulk attachments, stating "…parties and intervenors may not submit bulk filings confidentially without a redacted version submitted publicly" (Objection at 2, citing, Procedural Order). However, PURA's Procedural Order allowed the opportunity for a proponent to explain why there might need to be additional time to file the redacted version and Motion No. 39 specifically lays out a plan to provide the confidential bulk attachments as public redacted documents (Motion No. 39, at 3).

Regarding the confidential-only attachments that the Company does not plan to file a redacted version for, the Company has provided specific justification for each. Below is a summary of each document from Motion No. 39 that the Company does not plan to provide a redacted version for.

- EOE-001, Attachment 1 CONFIDENTIAL is a ZIP file that 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 (Motion No. 39, at 3). In EOE's objection, EOE states "EOE does not object to the protection of customer calls that include individually identifiable information and employee names and personal contact information."

- EOE-003, Attachment 1 CONFIDENTIAL through Attachment 33 CONFIDENTIAL provide internal audits related to the Company's information technology. 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 (id., at 8). There is no feasible manner that the Company can redact these materials as the total content of the audit format is confidential.

- EOE-015, Attachment 1 CONFIDENTIAL provides an audit of the Company's emergency response function. 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 (id., at 9).

- EOE-026, Attachment 1 CONFIDENTIAL provides information relating to a settlement negotiated by the Company. 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 (id., at 16).

- EOE-057, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL provide internal audit reports related to the Company's procurement organization, procurement applications, and related activities, which are commercially sensitive topics. 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 (id., at 8).

- 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. 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 (id., at 18).

EOE further objects to the Company's redaction for relevance of EOE-003, EOE-057, and EOE-061 (Objection, at 2).. These documents were redacted for relevance because they contain information regarding Eversource's other businesses outside of Connecticut, or outside of Connecticut's regulatory sphere and such information is therefore not germane to this proceeding. This approach complies with past practice.

Please contact me if there are any questions with respect to this filing.

Very truly yours,



Sarah A. Pardee

cc: Service List