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 24, 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 October 27, 2026 ("PURA Set 16") contains vendor pricing and contract terms and non-public tax return related 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 PURA Set 16:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
PURA-007	Attachment 2 CONFIDENTIAL Attachment 3 CONFIDENTIAL	November 20, 206	November 20, 2026

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on November 20, 2026. The last item responsive to PURA Set 15 was filed with PURA on November 20, 2026.

Third-party Pricing Information and Contract Terms

2. PURA-007, Attachment 2 CONFIDENTIAL, contains confidential vendor pricing and contract term information relating to the Company's third-party vendors. The pricing and negotiated terms from third parties and consultants are confidential and proprietary, and public disclosure of this information 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 includes 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 vendors. 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.

3. Pursuant to Item 6(b) of PURA's Revised Procedural Order and Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in response to PURA-007, Attachment 2 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).

4. PURA has approved requests to protect negotiated pricing and contract information as confidential. See, Docket No. 26-05-10 (Aug. 3, 2026 Ruling on Motion No. 10 at 4-5) (protecting as confidential negotiated contract terms, pricing, and unit cost information); (Sept. 24, 2026 Ruling on Motion No. 10 at 3-4) (protecting as confidential negotiated contract terms, pricing, and unit cost information); 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. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Apr. 14, 2025 Ruling on Motion No. 54) (protecting as confidential negotiated insurance coverages, sub-limits, and retentions); 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).

Tax Returns and Related Tax Information

5. PURA-007, Attachment 3 CONFIDENTIAL, provides tax information for the Company and its affiliates. This tax information is confidential, and public disclosure of this information would adversely impact the Company. Conn. Gen. Stat. § 12-15 and Section 6103 of the Internal Revenue Code of 1986 protect tax return and return information from public disclosure (subject to limited exceptions that do not apply here). An October 18, 2005 Opinion from the Connecticut Office of the Attorney General states in relevant part that:

> Section 12-15 of the General Statutes imposes very strict confidentiality requirements on tax returns and return information. No tax return or return information can be disclosed except as permitted by §12-15, and any person who violates the confidentiality requirements of §12-15 may be subject to a fine of not more than one thousand dollars or imprisonment of not more than one year, or both.

See Connecticut Attorney General Opinion No. 2005-028, Oct. 18, 2005, 2005 WL 4258775. The IRS stated with respect to federal tax return information that "Section 6103 [in 26 U.S.C.A.] provides that returns and return information shall be confidential and may not be disclosed except

as authorized by the Code."[1] Tax returns are also specifically exempt from the Freedom of Information Act pursuant to Conn. Gen. Stat. § 1-210(b)(10). Based on the above-referenced statutes, the tax information provided by the Company in PURA-007, Attachment 3 CONFIDENTIAL, is exempt from disclosure under Connecticut's public records laws and must be treated as confidential.

6. This information is protected from public disclosure pursuant to Item 6(i) of PURA's Revised Procedural Order Regarding Protected Materials, dated September 17, 2026 ("Revised Procedural Order"). Additionally, pursuant to Conn. Gen. Stat. § 1-210(b), the Authority is authorized to protect from public disclosure "trade secrets," which for purposes of the Freedom of Information Act are defined as information, including compilations and 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). PURA is also authorized to protect from public disclosure "[c]ommercial or financial information given in confidence, not required by statute." Conn. Gen. Stat. § 1-210(b)(5)(B).

7. PURA has previously granted similar requests to maintain tax returns and related tax information as confidential. See, e.g., Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend Their Rate Schedules (Feb. 21, 2024 Ruling to Motion No. 53); Docket No. 22-08-08, Application of the United Illuminating Company to Amend its Rate Schedules (Dec. 14, 2022 Ruling on Motion No.

[1] See http://www.irs.gov/irm/part37/irm_37-001-002.html

44) (granting protective treatment to income tax return documents) (Feb. 2, 2023 Ruling on Motion No. 52) (protecting as confidential payroll tax withholding information); Docket No. 18-05-10, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Aug. 22, 2018 Ruling on Motion Nos. 36, 37, and 38); Docket No. 16-06-04, Application of the United Illuminating Company to Increase Rates and Charges (August 17, 2016 Ruling on Motion No. 12) (tax return information); Docket No. 14-05-06RE01, Application of The Connecticut Light and Power Company to Amend its Rate Schedules- Audit Adjustment (Apr. 20, 2015 Ruling on Motion No. 4) (protection of Form 1120 income tax returns).

Tax Identification Number

8. PURA-007, Attachment 3 CONFIDENTIAL, contains the tax identification registration number of the Company. Public release of the tax identification registration number could damage the Company by subjecting it to potential fraud, theft, and other abuses.

9. The tax identification registration number is exempt from public disclosure as "[c]ommercial or financial information given in confidence, not required by statute." Conn. Gen. Stat. § 1-210(b)(5)(B). The tax information qualifies under this category of protected information because it is: (a) commercial or financial information; (b) given in confidence; and (c) not required by statute. The first element of this standard is satisfied because this information falls within the plain, ordinary meaning of "commercial information." Black's Law Dictionary (12th ed. 2024), "commercial" ("Of, relating to, or involving the selling of goods or services for profit."). The second element of this standard is satisfied because this information was intended to remain private. Lastly, the information qualifies under this exemption because public disclosure is not required by statute. The Company is producing this information as part of a discovery filing in an ongoing regulatory proceeding and not pursuant to a statutory mandate.

10. PURA has previously granted protective treatment to maintain the confidentiality of the same or similar information. See Docket No. 18-05-10, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (July 12, 2018 Ruling on Motion No. 12) (protecting pricing information, taxpayer identification numbers, and bank account information).

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

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

13. Additionally, pursuant to the Revised Procedural Order, the Confidential Information is the type of information that is typically subject to protected treatment, specifically, third-party pricing, and tax returns and related information.

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

15. 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.

16. 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 November 24, 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