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 14, 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 the Office of Consumer Counsel the ("OCC") on August 18, 2026 ("OCC Set 8"), contain confidential customer information, employee names, internal presentations and memoranda of the Eversource (Massachusetts) AMI Executive Steering Committee, and consultant models, 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 OCC Set 8:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
OCC-416	Attachment 1 CONFIDENTIAL	September 1, 2026	September 1, 2026
OCC-418	Attachment 1 CONFIDENTIAL through Attachment 4 CONFIDENTIAL*	N/A – Filed as Confidential only**	September 9, 2026
OCC-421	Attachment 1 CONFIDENTIAL through Attachment 4 CONFIDENTIAL	N/A – Filed as Confidential only	September 9, 2026
OCC-422	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	September 1, 2026	September 1, 2026

*OCC-418, Attachments 2 and 3 CONFIDENTIAL, are filed as two PDF documents labeled as .1 and .2 due to large file size.

** The attachments to OCC-418 were provided on a non-redacted, confidential-only basis while the Company undertakes the manual process of a significant bulk redaction project to provide these attachments for the public record.

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on September 1, 2026, and September 9, 2026. The last item responsive to OCC Set 8 was filed with PURA on September 9, 2026.[1]

Customer Information

2. OCC-416, Attachment 1 CONFIDENTIAL, is a vendor invoice for storm damage work that contains specific customer account information and customer identifying information, including a customer's name, address and phone number. The Company does not disclose customer information, including the name, address, and phone numbers of customers to the public.

[1] Pursuant to PURA's Procedural Order Regarding Protected Filings, July 10, 2026, a single motion for a protective order addressing all requests for confidential treatment of responses to a particular set of discovery shall be filed no later than no later than two days after the latest due date for any portion of that set. With respect to OCC Set 8, this date was Friday, September 11, 2026. This Motion for Protective Treatment of Confidential Information is dated Monday, September 14, 2026, as the next business day, due to the fact that additional time was needed to examine the voluminous documentation subject to confidential treatment and confirm details with the subject matter experts as to the plan for redaction, unavoidably causing the Motion to be submitted after September 11, 2026.

Any public disclosure of the Company's customer information would harm the customer's privacy interest.

3. Connecticut law and Company policy prohibit the Company from publicly disclosing information about its customers without a customer's 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 OCC-416, Attachment 1 CONFIDENTIAL, absent the consent of the affected customer, the Company could be exposed to legal claims, 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-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).

OCC-418 Presentations and Memoranda of the Eversource (Massachusetts) AMI Executive Steering Committee

6. OCC-418, Attachment 1 CONFIDENTIAL through Attachment 4 CONFIDENTIAL, are copies of internal presentations and memoranda made to the Eversource (Massachusetts) AMI Executive Steering Committee. The presentations and memoranda are exceedingly detailed, containing references to comprehensive strategic discussion, internal analysis, risk assessment, financial analysis, confidential vendor information, and potential references to critical energy infrastructure information or cybersecurity information or other non-public information, among other proprietary information.

7. Importantly, the presentations and memoranda provided in OCC-418, Attachments 1 through 4 CONFIDENTIAL, pertain to the Eversource Massachusetts AMI implementation and have not yet been presented to the Massachusetts Department of Public Utilities ("MDPU"), as the schedule for the Massachusetts AMI filings will not involve the submission of this information

until summer 2027. When it is presented to the MDPU, it will be presented as confidential, non-public information and it will meet the MDPU's standard for confidentiality for all of the same reasons that it meets the requirements of PURA's Procedural Order Regarding Protected Materials, dated July 10, 2026, in addition to the MDPU's standard of practice.

8. PURA has previously protected strategic discussion, internal analysis, risk assessment, financial analysis, confidential vendor information, and references to critical energy infrastructure information or cybersecurity information from public disclosure. See, e.g., Docket No. 14-01-46, Joint Application of Frontier Communications Corporation and AT&T Inc. for Approval of a Change of Control (Feb. 21, 2014 Ruling on Motion No. 1) (protecting sensitive and proprietary financial information); PURA Investigation Into the Re-Financing Arrangements of Frontier Communications (June 25, 2019 Ruling on Motion No. 3) (approving protective treatment for non-public financial information); Docket No. 17-06-30, Joint Application of Eversource Energy and Macquarie Utilities Inc. for Approval of a Change of Control (Aug. 24, 2017 Ruling on Motion No. 6) (approving on reconsideration protective treatment for information relating to strategic business information); Docket No. 16-06-04, Application of The United Illuminating Company to Increase Its Rates and Charges (Aug. 17, 2016 Ruling on Motion No. 13) (protecting non-public ratings agencies presentations); Docket No. 09-12-05, Application of the Connecticut Light and Power Company to Amend its Rate Schedules (Feb. 4, 2010 Ruling on Motion No. 16) (protecting financial information presented to credit rating agencies). 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. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend their Rate Schedules (Mar. 11, 2024, Ruling on Motion No. 86) (protecting cybersecurity documents as confidential); 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).

Employee Names

9. OCC-418, Attachment 1 CONFIDENTIAL through Attachment 4 CONFIDENTIAL, and OCC-422, Attachments 1 and 2 CONFIDENTIAL, contain names of individual employees. Specifically, OCC-418, Attachment 1 CONFIDENTIAL through Attachment 4 CONFIDENTIAL contain individual Eversource employee names, and OCC-422, Attachments 1 and 2 CONFIDENTIAL, contain the names of individual Eversource employees,

as well as employees from the Office of Consumer Counsel ("OCC") and the Department of Energy and Environmental Protection ("DEEP").

10. 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).

11. 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).

Confidential Consultant Models

12. OCC-421, Attachment 1 CONFIDENTIAL through Attachment 4 CONFIDENTIAL, are West Monroe Partners, LLC's (West Monroe) working models. These models were created, developed, and are maintained by West Monroe. The models were created utilizing proprietary knowledge and are protected as intellectual property. West Monroe informed CL&P that the information within OCC-421, Attachment 1 CONFIDENTIAL through Attachment 4 CONFIDENTIAL, including the formulas, methods, and techniques, is proprietary information that competitors to West Monroe would find highly financially valuable and could result in significant financial hardships for West Monroe if disclosed. Further, the data analysis and formulaic computations contained within OCC-421, Attachment 1 CONFIDENTIAL through Attachment 4 CONFIDENTIAL, are proprietary to West Monroe and are not known outside of

West Monroe. The commercial value of these models would be substantially reduced if they were made publicly available to any parties including other consultants who compete with West Monroe to provide similar consulting services. For this reason, West Monroe does not disclose the models publicly, and requires that CL&P provide the Excel models as confidential-only exhibits. West Monroe has provided an affidavit to address its concerns relating to the confidentiality of its confidential model documents. See Attachment B.

13. PURA has previously protected from public disclosure the proprietary and confidential models and formulae developed by third party consultants. See, e.g., 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).

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(a) and (b), as described herein.

16. 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, employee names, and consultant proprietary information.

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

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. As noted previously, Attachment B, is the Affidavit of Timothy Valin, Senior Partner in the Energy and Utilities practice at West Monroe Partners, LLC, and he addresses the confidentiality of the West Monroe models discussed herein.

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

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CERTIFICATION

I hereby certify that on September 14, 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