Re: Docket No. 26-05-10 – Comments Regarding Motion No. 3

Dear Commissioners,

We write in support of the concerns raised by the Office of Consumer Counsel (OCC) and the Office of Education, Outreach, and Enforcement (EOE) regarding Eversource's proposed modifications to its rate case filing procedures, specifically as they relate to the confidential filing of bulk documentation. We appreciate the opportunity to submit these comments for the Authority's consideration.

Our understanding is that a rate application should be publicly available and accessible to any and all interested members of the public, unless a specific exemption applies. The Freedom of Information Act requires that "all records maintained or kept on file by any public agency…shall be public records and every person shall have the right to inspect, copy, or receive a copy of such records" unless specifically exempted from disclosure. Conn. Gen. Stat. § 1-210. As OCC and EOE have noted, there is no exemption for bulk filings.[1,2] We are concerned that Eversource's proposal to file high-volume confidential documents without publicly available redacted versions, substituting a table of contents instead, is inconsistent with these obligations, outside the norm of practice in Connecticut and surrounding states, and unreasonably burdensome to other participants in the docket.[3]

The practical impact of this proposal on non-utility stakeholders will be to decrease docket navigability, requiring additional time and effort for the same result. Unlike Eversource, community organizations, individual ratepayers, and advocacy groups do not always have the resources to submit discovery requests, retain expert witnesses, or access unredacted confidential documents under a non-disclosure agreement. Bandwidth is a significant constraint on many docket participants, and, for some, a clear, navigable public docket may be the only means of following a proceeding. Our understanding is, as EOE has noted, that it is Eversource's duty to publicly provide the Authority with the information it requires, and the burden of producing a publicly available filing appropriately rests with Eversource.[4] The utility's administrative burden should not outweigh the public's access to non-confidential information, particularly on such a critical topic as an increase in rates. Eversource's proposal would limit such public access at the outset of the proceeding, encumbering the public's ability to scrutinize the Company's filings in support of its requested rate increase.

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[1] OCC Motion for Technical Meeting or Pre-Filing Guidelines, dated May 26, 2026 (Motion No. 3), p. 2
[2] EOE Response to Motion No. 3, dated June 1, 2026, p. 1
[3] EOE Response to Motion No. 3, p. 1
[4] EOE Response to Motion No. 3, p. 2

We respectfully submit these comments for the Authority's consideration and thank the Authority for its time.

Respectfully submitted,

Lindsay Griffin, Vote Solar
Michael Uhl, System Smart LLC
Mary Hogue, Fairfield Forestry Committee
Kathy Fay, NHS of New Haven
Kate McAuliffe, Acadia Center
Charles J. Rothenberger, Save the Sound
Shannon Laun, Conservation Law Foundation