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 12, 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," "CL&P," or "Eversource") 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 Education, Outreach, and Enforcement ("EOE") on September 11, 2026 and October 13, 2026 ("EOE Sets 5 and 8") contains employee names and contact information, bid evaluation information, customer information, third-party pricing information and contract terms, and banking 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 in EOE Sets 5 and 8:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
EOE-227-SP01	Attachment 1 CONFIDENTIAL	October 27, 2026	October 27, 2026
EOE-377	Attachment 1 CONFIDENTIAL	N/A – Filed as Confidential Only[1]	October 26, 2026
EOE-386	Attachment 1 CONFIDENTIAL	October 27, 2026	October 27, 2026
EOE-387	Attachment 1 CONFIDENTIAL	October 27, 2026	October 27, 2026
EOE-391	Attachment 1 CONFIDENTIAL through Attachment 6 CONFIDENTIAL	October 27, 2026	October 27, 2026
EOE-396	Attachment 1 CONFIDENTIAL through Attachment 5 CONFIDENTIAL Attachment 7 CONFIDENTIAL	October 30, 2026	October 30, 2026
EOE-397	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 29, 2026	October 29, 2026
EOE-408	Attachment 1 CONFIDENTIAL	October 28, 2026	October 28, 2026

Together, these documents are referred to herein as the "Confidential Information." The Confidential information was submitted to PURA via email on October 26, 2026; October 27, 2026 October 28, 2026; October 29, 2026; and October 30, 2026. The last response to EOE Set 8 was filed with PURA on November 12, 2026.

Employee Names and Contact Information

2. EOE-227-SP01, Attachment 1 CONFIDENTIAL; EOE-386, Attachment 1 CONFIDENTIAL; EOE-387, Attachment 1 CONFIDENTIAL; EOE-391, Attachments 1 through 6 CONFIDENTIAL; EOE-396, Attachment 1 CONFIDENTIAL; and EOE-936, Attachment 5 CONFIDENTIAL, contain names and contact information for individual Eversource employees. Employee names and contact information should be protected from public disclosure. If the

[1] See Paragraph 16, below.

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 Regarding Protected Materials, dated September 17, 2026 ("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). See, 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).

Third-party Pricing Information and Contract Terms

5. EOE-386, Attachment 1 CONFIDENTIAL; EOE-391, Attachments 1 through 6 CONFIDENTIAL; EOE-396, Attachments 1 through 5 CONFIDENTIAL; EOE-936, Attachment 7 CONFIDENTIAL; and EOE-408, Attachment 1 CONFIDENTIAL, contain 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 these attachments include 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. Additionally, the Confidential Information in EOE-936, Attachment 4 CONFIDENTIAL, includes confidential bank account numbers of the vendor, which are not disclosed publicly and if disclosed could subject the Company, its vendor, and banking partners to potential fraud and abuse.

6. 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 EOE-386, Attachment 1 CONFIDENTIAL; EOE-391, Attachments 1 through 6 CONFIDENTIAL; EOE-396, Attachments 1 through 5 CONFIDENTIAL; EOE-936, Attachment 7 CONFIDENTIAL; and EOE-408, Attachment 1 CONFIDENTIAL, qualify 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).

7. 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).

8. Additionally, PURA has previously protected confidential banking information such as that contained in EOE-936, Attachment 4 CONFIDENTIAL. See, e.g., 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 bank account numbers and tax identification numbers); Docket No. 18-03-38, 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 Rates and Charges (Aug. 8, 2016 Ruling on Motion No. 10) (approving motion for protective order for rate case expense); 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. 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).

Bid Evaluations

9. EOE-397, Attachments 1 and 2 CONFIDENTIAL, provide evaluation of the vendor bids provided in response to an RFP, as well as information on bid evaluation methodology information. 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 Company's 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.

10. Pursuant to Item 6(b) of the Revised Procedural Order and Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in EOE-397, Attachments 1 and 2 CONFIDENTIAL, qualifies as "trade secrets" for purposes of 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).

11. PURA has previously granted similar requests related to vendor bids 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).

Customer Call Recordings

12. EOE-377, Attachment 1 CONFIDENTIAL, is a call recording that contains specific customer account information and customer identifying information. The Company does not disclose customer information, including customer calls, account numbers, or financial information of customers to the public. Any public disclosure of the Company's customer information would harm its customers' privacy interests.

13. Customer information is protected from public disclosure pursuant to Item 6(a) of PURA's Revised Procedural Order as well as Conn. Gen. Stat. §1-210(a) and (b). Section 1-210(a) provides an exception to FOIA for information otherwise protected under federal law or state statute. In this instance, the Confidential Information is protected and qualifies for an exception to FOIA pursuant to Conn. Gen. Stat. § 42-471. Moreover, Section 1-210(b)(2) exempts files "the disclosure of which would constitute an invasion of personal privacy" and Section 1-201(b)(5)(B) exempts from disclosure "[c]ommercial or financial information given in confidence, not required by statute." Further, Connecticut law and Company policy prohibit the Company from publicly disclosing information about its customers without such customers' written consent. See, e.g., Conn. Agencies Regs. § 42-471(a) (providing 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.").

14. If the Company were to publicly disclose EOE-377, Attachment 1 CONFIDENTIAL, absent the consent of the affected customer, the Company could be exposed to legal claims from the customer, including but not limited to, complaints made to the Office of the Attorney General and the Connecticut Department of Consumer Protection.

15. PURA has routinely protected from public disclosure customer call recordings and account-specific information of utility customers. See, Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (May 20, 2025 Ruling on Motion No. 95) (protecting from public disclosure customer call recordings); Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend their Rate Schedules (Dec. 6, 2023 Ruling on Motion No. 23) (protecting from public disclosure customer call recordings); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Feb. 15, 2023 Ruling on Motion No. 53) (protecting as confidential recordings of customer calls); Docket No. 20-03-15, Emergency Petition of William Tong, Attorney General for the State of Connecticut, for a Proceeding to establish a State of Emergency Utility Shut-off Moratorium, (Jan. 13, 2022 Ruling to Motion No. 62) (protecting audio recordings of phone calls between the companies' customer

service representatives and customers). Additionally, PURA has previously protected from public disclosure account-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).

16. The Company is providing EOE-377, Attachment 1 CONFIDENTIAL, as a confidential-only document. The Company considers this document highly confidential and does not disclose it publicly. Further, this document is a live audio file, which is not subject to redaction.

17. The Confidential Information is maintained by the Company as confidential and the Company has limited the disclosure of this information where possible.

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

19. 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 and contract terms.

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

21. 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.

22. 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 12, 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