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 6, 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 Department of Energy and Environmental Protection ("DEEP") Bureau of Energy and Technology Policy ("BETP") on October 6, 2026 ("DEEP Set 1") contains Critical Energy Infrastructure Information ("CEII"), and third-party pricing information and contract terms, 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 DEEP Set 1:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
BETP-015	Attachment 1 CONFIDENTIAL	October 27, 2026	October 27, 2026
BETP-017	Attachment 1 CONFIDENTIAL	October 26, 2026	October 26, 2026
BETP-053	Attachment 1 CONFIDENTIAL	October 26, 2026	October 26, 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, and October 27, 2026. The last item responsive to DEEP Set 1 was filed with PURA on November 5, 2026.

CEII

2. Pursuant to Item 6(d) of PURA's Revised Procedural Order Regarding Protected Materials, dated September 17, 2026 ("Revised Procedural Order") and Conn. Gen. Stat. § 1-210(b)(19), BETP-015, Attachment 1 CONFIDENTIAL, and BETP-017, Attachment 1 CONFIDENTIAL, contain CEII of the Company's electric distribution system.[1] Section 1-210(b)(19) exempts from public disclosure "[r]ecords when there are reasonable grounds to believe disclosure may result in a safety risk, including the risk of harm to any person, any government owned or leased institution or facility or any fixture or appurtenance and equipment attached to, or contained in, such institution or facility[.]" Section 1-210(b)(19) defines "government-owned or leased institution or facility" as including a "facility owned or leased by a public service company, as defined in section 16-1[.]"

3. The Confidential Information provided in BETP-015, Attachment 1 CONFIDENTIAL, and BETP-017, Attachment 1 CONFIDENTIAL, includes location data for

[1] 18 C.F.R. § 388.113(c)(2) defines CEII: "Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that" (i) Relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) Could be useful to a person in planning an attack on critical infrastructure; (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552; and (iv) Does not simply give the general location of the critical infrastructure."

distributed energy resources. If disclosed, this information would create a system security risk and provide bad actors with detailed information relating to the Company's infrastructure and jeopardize operation of the Company's systems.

4. The Confidential Information is exempt from disclosure pursuant to Federal Energy Regulatory Commission ("FERC") procedure, which requires specific procedures for the handling of CEII. FERC procedure requires that any sharing of CEII is for a legitimate purpose and done in such a manner to ensure that CEII is not placed in the public domain. See 18 C.F.R. § 388.113. Public disclosure of CEII would be contrary to standards established by FERC that are aimed at protecting the security, public health and safety, and economic security of the United States. The Company also asks that recipients of such CEII be required to abide by existing best practices for maintaining the security of CEII.[2]

5. PURA has granted similar requests to maintain information such as the CEII contained in the Confidential Information as confidential. See 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 as confidential Yankee's CEII); Docket No. 16-06-04, Application of The United Illuminating Company to Increase Rates and Charges (August 9, 2016 Order on Motion No. 10) (protecting as confidential CEII); Docket No. 13-01-19, Application of The United Illuminating Company to Increase Rates and Charges (Apr. 16, 2013 Order on Motion No. 9; Apr. 30, 2013 Order on Motion No. 13) (protecting as confidential CEII).

[2] For example, (i) recipients of CEII may only discuss CEII with another recipient of the identical CEII, (ii) recipients of CEII may use CEII as foundation advice provided to others but may not disclose CEII to another individual unless that individual is an approved CEII recipient of the same CEII, (iii) recipients of CEII will not use it for an illegal or non-legitimate purpose, and (iv) the CEII is to be maintained in a secure place with access limited to CEII recipient of the identical material.

Third-party Pricing Information and Contract Terms

6. BETP-053, Attachment 1 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.

7. 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 BETP-053, Attachment 1 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).

8. 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).

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

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

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

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

13. 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.

14. 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 6, 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