STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

June 1, 2026
Docket No. 26-05-10
Motion No. 3

Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

RE: Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Commissioners:

Eversource is asking the Authority to put a price on the freedom of information. The Connecticut Light & Power Company d/b/a Eversource Energy's (Eversource) correspondence dated May 29, 2026 (Eversource Corresp.), filed in response to the Office of Consumer Counsel's (OCC) Motion for a Technical Meeting or Pre-filing Guidelines, dated May 26, 2026 (Motion No. 3), and Eversource's previously undocketed correspondence dated May 5, 2026 (Eversource Undocketed) proposes to limit the information publicly disclosed to rate payers. The Office of Education, Outreach, and Enforcement (EOE) respectfully submits these comments in response to the Public Utilities Regulatory Authority (Authority) for consideration.

First, Eversource proposes to file bulk records not through the public record but through SharePoint. Eversource Corresp. pp. 2-3; Eversource Undocketed, pp. 2-3. Eversource's focus on this issue seems to be on a meeting held between Eversource, OCC, and EOE on May 28, 2026, suggesting that the state parties agreed with Eversource's proposal as far as the presentation of the bulk documentation Eversource is required to file. Eversource Corresp. pp. 1-2. To be abundantly clear, it does not matter whether EOE and OCC find the presentation of Eversource's bulk documentation agreeable. The Freedom of Information Act (FOIA) 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 (1) inspect such records promptly during regular office or business houses, (2) copy such records…or (3) receive a copy of such records…" unless such information is exempted from disclosure. General Statutes § 1-210. The last time EOE checked, FOIA does not include an exemption for bulk filings. Similarly, Eversource is seeking to file confidential documents without publicly available redacted versions. Eversource Corresp. pp. 4-5; Eversource Undocketed, p. 3. Eversource is attempting to circumvent the public's easy access to information so it is easier for their witnesses to view documents during a hearing and limit redacting specific confidential information when the entire document would not otherwise be exempt from public filing.

This is not acceptable. Eversource's Notice of Intent, dated May 20, 2026 (NOI), indicates that it is seeking an 11% increase to customer's bill with a 35% increase to the distribution revenue. NOI, p. 7. Now, more than ever, it is vital that customers can easily access the information in this matter. They have a right to understand what they are paying for and why Eversource is seeking such an increase. Eversource's proposal hides that information from them. Eversource must come to terms with the fact that documentation held by the Authority is to be publicly available and they are a highly regulated state sanctioned monopoly. It is their duty to ***publicly*** provide the Authority with the information it requires, regardless of Eversource's preferences.

Even though Eversource attempts to mitigate any additional burden its proposal may have on the Authority or other parties, their attempts are not satisfactory. EOE does not believe it is appropriate for the Authority to rely on Eversource's assistance in responding to "any valid and properly limited [FOIA] requests." Eversource Corresp. p. 3. It is the Authority who has the discretion in response to a FOIA request, and the Authority may be compelled to fully disclose the ***unredacted*** "high-volume documents" since there will be no appropriately redacted version of those documents in the agency's possession.[1]

Eversource's proposal pertaining to hearings is equally unreasonable. It fully places the burden on the Authority and other parties to indicate what additional information it may seek during cross examination in advance of hearings and to guess which documents are relevant. Id. It is inappropriate to shift to the parties this burden of reviewing Eversource's rate amendment application when, in fact and in law, it is Eversource's burden to produce a publicly available filing.

Furthermore, Eversource's proposed procedures being consistent with their process in Massachusetts is not dispositive in this matter. Massachusetts has its own freedom of information act to which its regulators must comply. The Authority must comply with Connecticut law and Connecticut's FOIA and Eversource's proposal, unfortunately, does not.

Finally, in accordance with the Authority's Notice of Procedural Conference dated June 1, 2016, EOE requests to be made a participant to said Procedural Conference to be held on June 16, 2026.

It is important to stress what is at issue here. The question is not how easy filing documents should be for Eversource or how easy document review should be for other parties. The question is what information is legally required to be publicly available. While EOE appreciates the time and effort required to redact these documents for an

[1] EOE questions if the Authority should even rely on the judgment of a party who regularly seeks protective orders on information they already publicly filed in the same docket. See EOE Objection to Motion No. 25, dated March 9, 2025, Docket No. 25-12-13, Application of Connecticut Light and Power Company d/b/a Eversource Energy for Order to Securitize 2018-2023 Catastrophic Storm Costs ("EOE sees no reason why earlier versions of the same Procurement Manual and Policy require redaction while the most recent revisions are publicly available in this docket already. Furthermore, Eversource has provided unredacted public versions of these documents in other dockets.").

appropriate public filing, EOE does not believe Eversource's costs and efforts to redact documents outweigh the FOIA.

EOE thanks the Authority for consideration of these issues.

Sincerely,
By: /s/*Thomas Lopez*
Thomas Lopez
Director
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement

CERTIFICATE OF SERVICE

I hereby certify that on this day the foregoing document was filed with the Public Utilities Regulatory Authority, and copies thereof were served upon each person designated on the official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

Sincerely,

By: /s/*Thomas Lopez*
Thomas Lopez
Director
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement