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

September 8, 2026
In response to Motion No. 39

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

Re: Docket No. 26-05-10 – Application of The Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules

Dear Commissioners

The Office of Education, Outreach and Enforcement (EOE) respectfully objects to the Motion for Protective Order (Motion) filed by Connecticut Light and Power Company d/b/a Eversource Energy (Eversource or Company). In the Motion, the Company request protection for a myriad of documents submitted in response to 18 EOE Interrogatories in Sets 1 and 2, including 117 attachments, claiming that the documents contain "confidential customer call recordings, cybersecurity information, internal audits, settlement agreement information, employee names and contact information, vendor pricing and negotiated contract terms, and banking information, which the Company does not disclose publicly." Motion No. 39, p. 1.

While EOE does not object to the protection of customer calls that include individually identifiable information and employee names and personal contact information, EOE does object to the Company's blatant disregard for the Authority's Procedural Order Regarding Protected Materials (July 10, 2026) ("Procedural Order") requiring parties to file a motion for protective order "[n]o later than two days after responses to a set of interrogatories are due," Procedural Order ¶ 1, and further disallowing the Company's request to file "confidential only" responses, i.e. without also filing public redacted versions of those documents. Id ¶ 6.

EOE objects to the Company's improper filing of the motion days, and in some cases weeks, after the interrogatory responses were filed in violation of Procedural Order ¶1. By its own admission, the Company filed Motion No. 39 on September 1, 2026, in violation of (see the i. See Motion, pages 2-3, Table 1, column 4.

In addition, EOE objects to the Company's request to file "confidential only" document, i.e. without any corresponding public redacted versions, of most of the documents for which they claim protection. Motion, pp. 2-3, Table 1, Column 3 in further violation of the Procedural Order in this docket.

The Authority has already rejected Eversource's request to be allowed to forego filing public redacted versions of large confidential documents, Procedural Order Regarding Protected Materials (July 10, 2026) ("Procedural Order") at 2 n.2. The Authority stated "…parties and intervenors may not submit bulk filings confidentially without a redacted version submitted publicly," and a party seeking to do so must file a motion demonstrating "extraordinary circumstances." The Procedural Order is similarly clear where is states, "[s]heer volume is not a sufficient basis for submitting bulk filings only confidentially, without submitting a public version." Procedural Order ¶ 6. The Company filed no such motion and demonstrates no extraordinary circumstance; the Motion simply announces that the documents were submitted days, and in some cases, several weeks ago.

EOE further objects to Eversource's "redaction for relevance" of documents. Motion, p. 3. The Motion states that "[c]ertain confidential attachments to EOE-003, EOE-057, and EOE-061 are redacted for relevance." Motion, p. 3. However, the Company fails to identify any legal authority that allows a responding party to withhold public information based on that party's own determination of the relevance of the material. In fact, by "redacting" a confidentially filed document Eversource ensures that no one, not even the Authority has an opportunity to review the complete documents, and the Company has thereby designated itself as the decision maker regarding what the record contains. The Authority should order the complete unredacted documents be submitted and should require the Company to object to evidence it believes is outside the scope of the proceeding through the process for raising such objections.

A rate case is the opportunity for all ratepayers to understand how their money is being spent, and more importantly, for Eversource to justify such spending to all ratepayers. It is difficult to conduct a hearing that benefits the public if a significant portion of the Companies' interrogatory responses is considered confidential and never available for public scrutiny. EOE believes the above discussed information should be publicly available because the Company has not provided sufficient information in their Motion to explain why this information should be exempt under Conn. Gen. Stat. §1- 210, or any statute.

Given the strong presumption by the Authority that all documents filed with it are public records subject to the right of public inspection and copying in accordance with the Connecticut Freedom of Information Act, Conn. Gen. Stat. § 1-200 *et seq*., EOE objects to those portions of Motion No. 39 specified above.

Sincerely,

By: /s/ *Rebecca E. Adams*
Rebecca E. Adams
Staff Attorney
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/*Rebecca E. Adams*
Rebecca Adams
Staff Attorney
PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach and Enforcement