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 Office of Consumer Counsel (the "OCC") on October 19, 2026 ("OCC Set 29"), and by Allco Finance Limited ("Allco") October 13, 2026 and October 19, 2026 ("ALLCO Sets 13 and 16"), contain customer call recordings, forward-looking financial projections, and employee names, 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 OCC Set 29, ALLCO Set 13, and ALLCO Set 16:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
ALLCO-186	Attachment 1 CONFIDENTIAL	November 5, 2026	November 5, 2026
ALLCO-215	Attachment 1 CONFIDENTIAL	November 5, 2026	November 5, 2026
OCC-977	Attachment 1 CONFIDENTIAL	November 2, 2026	November 2, 2026
OCC-978	Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL	November 5, 2026	November 5, 2026
OCC-980	Attachment 1 CONFIDENTIAL through Attachment 12 CONFIDENTIAL	N/A – Filed as Confidential Only[1]	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 28, 2026; November 2, 2026; and November 5, 2026. The last response to OCC Set 29 was filed with PURA on November 5, 2026. The last response to ALLCO Set 13 was filed with PURA on November 5, 2026. The last response to ALLCO Set 16 was filed with PURA on November 5, 2026.

Customer Call Recordings

2. OCC-980, Attachments 1 through 12 CONFIDENTIAL, are call recordings that contain specific customer account information and customer identifying information, including customer names, account numbers, as well as financial information relating to specific customers and adjustments made to their bills. 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.

3. 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-

[1] See Paragraph 6, below.

210(a) provides an exception to the Freedom of Information Act ("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.").

4. If the Company were to publicly disclose OCC-980, Attachments 1 through 12 CONFIDENTIAL, absent the consent of each affected customer, the Company could be exposed to legal claims from such customers, including but not limited to, complaints made to the Office of the Attorney General and the Connecticut Department of Consumer Protection.

5. 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).

6. The Company is providing OCC-980, Attachments 1 through 12 CONFIDENTIAL, as confidential-only documents. The Company considers these documents highly confidential and does not disclose them publicly. Further, these documents are live audio files, which are not subject to redaction.

Employee Names and Contact Information

7. OCC-977, Attachment 1 CONFIDENTIAL, OCC-978, Attachments 1 through 3 CONFIDENTIAL, and ALLCO-186, Attachment 1 CONFIDENTIAL, contain names and contact information for individual Eversource employees. Employee names and contact information should be protected from public disclosure. If the 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.

8. This information is protected from public disclosure pursuant to Item 6(f) of PURA's 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).

9. 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).

Financial Projections

10. ALLCO-215, Attachment 1 CONFIDENTIAL, contains non-public financial projections, the disclosure of which would harm the Company and provide non-public financial projections to the public at large. Public disclosure of this material would reveal strategic and competitive information that would be prejudicial and cause harm to the Company. Any public disclosure of such information would be detrimental to the business interests of the Company in their service to customers, and would allow unfair access to material, confidential, non-public financial information. These non-public financial projections, and the basis for these data and projections, are considered proprietary, commercially sensitive, and strategic non-public business information. In addition, such material could be misused or improperly relied upon by persons making investment decisions, thereby exposing the Company to potential claims and litigation if financial projections intended for private use differs from actual financial performance.

11. This information is protected from public disclosure pursuant to Item 6(g) of PURA's Revised Procedural Order as non-public business information. This information is also protected from public disclosure pursuant to Item 6(j) of PURA's Revised Procedural Order as confidential and proprietary formulae. Further, pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in response to ALLCO-215, Attachment 1 CONFIDENTIAL, qualifies as "trade secrets" for purposes of the Freedom of Information Act. 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).

12. PURA has granted requests to maintain as confidential financial projections similar to what is provided in ALLCO-215, Attachment 1 CONFIDENTIAL. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Service Company d/b/a Eversource Energy to Amend its Rate Schedules (Feb. 20, 2025 Ruling on Motion No. 41) (protecting as confidential forward-looking financial projections); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Nov. 3, 2022 Ruling on Motion No. 22) (protecting as confidential non-public forecast financial information); Docket No. 17-12-03RE11, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review (March 11, 2021 Ruling on Motion No. 11) (approving confidential treatment for

non-public financial projections); Docket No. 15-08-28, Application of RCLEC, Inc. For a Certificate of Public Convenience and Necessity to Provide Local Exchange and Interexchange Services in the State of Connecticut (Aug. 25, 2015 Order on Motion No. 1) (financial statements); Docket No. 14-01-46, Joint Application of Frontier Communications Corporation and AT&T Inc. for Approval of a Change of Control (Apr. 10, 2014 Order on Motion No. 13) (non-public financial information and financial analysis); Docket No. 09-12-05, Application of the Connecticut Light and Power Company to Amend its Rate Schedules (Feb. 4, 2010 Order on Motion No. 16) (financial information presented to credit rating agencies.

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

14. The Confidential Information is excepted and exempt from disclosure under the FOIA exemptions in Conn. Gen. Stat. §1-210(a) and (b), as described herein.

15. Additionally, pursuant to the Revised Procedural Order, the Confidential Information is the type of information that is typically subject to protected treatment, including customer information, non-public business information, and employee names.

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

17. 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.

18. 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 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