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" 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 PURA on October 13, 2026 ("PURA Set 12") contain confidential Requests for Proposals ("RFPs") and bid evaluations, 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 PURA Set 12:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
RSR-049	Attachment 2 CONFIDENTIAL	November 5, 2026	November 5, 2026
RSR-050	Attachment 2 CONFIDENTIAL	November 9, 2026	November 9, 2026

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on November 5, 2026; and November 10, 2026. The last response to PURA Set 12 was filed with PURA on November 10, 2026.

Employee Names and Contact Information

2. RSR-049, Attachment 2 CONFIDENTIAL, and RSR-050, Attachment 2 CONFIDENTIAL, contain names and contact information for individual CL&P 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 CL&P employees. Making employee information public triggers an increased risk in phishing attacks as there is more information available about CL&P 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 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 CL&Pce employee names and contact information pursuant to Section 1-210(b)(5)(B). 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).

Confidential Requests for Proposals and Bid Evaluations

5. RSR-049, Attachment 2 CONFIDENTIAL, and RSR-050, Attachment 2 CONFIDENTIAL, contain specific term and condition information provided to Eversource for services to be rendered in response to the Company's RFPs. The Confidential Information in RSR-049, Attachment 2 CONFIDENTIAL, and RSR-050, Attachment 2 CONFIDENTIAL, include information provided by the Company's outside vendors, which if disclosed to the public and competitors would cause substantial harm to the Company and to its vendors. This information includes proprietary, competitive, and commercially sensitive information. RSR-049, Attachment 2 CONFIDENTIAL, and RSR-050, Attachment 2 CONFIDENTIAL, also include confidential terms and conditions that are not disclosed publicly. This information has been anonymized to protect the confidentiality of the vendor bids.

6. Additionally, RSR-049, Attachment 2 CONFIDENTIAL, and RSR-050, Attachment 2 CONFIDENTIAL, provide evaluation of the vendor bids provided in response to the RFPs. These attachments include the Company's evaluation of the vendor bids, including the Company's internal technical analysis of each bidder and the quality of each bid submitted as well as internal classification of the bids. 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 Companies' 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.

7. Pursuant to Items 6(b) and 6(h) of the Revised Procedural Order as well as Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in RSR-033, Attachments 2 and 4 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 previously granted similar requests related to vendor bids, negotiated contract terms, 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).

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(b) and Conn. Gen. Stat. §§ 1-210(b)(5)(A) and (5)(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 employee names, negotiated contract terms, and internal bid evaluation processes.

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 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