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**
	:	**JULY 14, 2026**

MOTION FOR APPROVAL OF TIMEFRAME TO COMPLY WITH PROCEDURAL ORDER REGARDING PROTECTED MATERIALS

The Connecticut Light and Power Company d/b/a Eversource Energy (the "Company" or "CL&P") respectfully submits this motion to the Public Utilities Regulatory Authority ("PURA") for approval of a reasonable timeframe to comply with PURA's July 10, 2026 Procedural Order Regarding Protected Materials (the "Procedural Order").

The Procedural Order confirmed there are at least 11 categories of data that the Connecticut Legislature decided constitute "confidential information" that are exempt from public disclosure under the Connecticut Freedom of Information Act ("FOIA"). (Procedural Order at 3.) For example, the Procedural Order confirmed that FOIA exempts from public disclosure sensitive data about vulnerabilities in the electric grid that, if publicly disclosed, could be misused by bad actors to jeopardize the safety and public welfare of Connecticut residents and disrupt our electricity-dependent economy. (Id.) The Procedural Order also recognizes that FOIA exempts from public disclosure confidential pricing that belongs to third parties who supply equipment and services to utility companies. (Id.) Publicly disclosing confidential vendor pricing data harms the interest of electric customers because public disclosure could deter potential bidders from participating in the Company's solicitations, thereby undermining the Company's ability to obtain lower costs for customers. The Company appreciates that the Procedural Order recognizes that FOIA exempts

this type of sensitive data from public disclosure, which ultimately protects the best interests of electric customers. It is also helpful that PURA has delineated the types of information that would be deemed to be "confidential" under FOIA and exempt from public disclosure through this proceeding.

Importantly, the Procedural Order reversed prior PURA decisions that allowed "bulk", or large quantities, of documents containing confidential data to be exempt from public disclosure in their entirety.[1] In that regard, the Procedural Order indicates that, going forward, when bulk documents are produced containing confidential data, a utility company must also produce a public version of the information redacting the sensitive confidential data from the documentation, unless the utility company is able to demonstrate "extraordinary circumstances."[2] CL&P respects PURA's legitimate interest in making sure that customers have the means to understand why a rate increase is needed to continue safe and reliable electric service; and the Company supports

[1] See, e.g., Docket No. 25-12-13, Application of the Connecticut Light and Power Company d/b/a Eversource Energy for Order to Securitize 2018-2023 Catastrophic Storm Costs (April 2, 2026 Ruling on Motion No. 36) (PURA protected bulk confidential documentation provided in a folder and subfolder structure, and did not require a public filing version); Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (March 26, 2025 Letter Ruling on Motion No. 59) (PURA found that the Company was not required to publicly file bulk confidential documents, where the Company argued redactions to 33,000 pages of invoices would cost $97,000 and no feasible method for redactions other than manual review existed. Thus, PURA allowed confidential-only production of thousands of pages of extreme bulk confidential attachments); Docket No. 24-03-30, Investigation of the 2018-2021 Catastrophic Storm Costs Reported by The Connecticut Light and Power Company d/b/a Eversource Energy, (August 27, 2024 Letter Ruling to Motion No. 17) (PURA protected confidential-only versions of vendor invoices in their entirety to protect the interest of customers in maintaining competitive pricing; Company had also noted that records consisted of 152,000 pages of invoices that would have cost $275,000 to $400,000 to redact, which was not reasonable); Docket No. 21-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company (March 23, 2021 Letter Ruling on Motion No. 2) (protecting bulk financial and trade secret information including vendor invoices and information for projects and programs, submitted in a folder and subfolder structure); Docket No. 20-08-03, Investigation into Electric Distribution 9 Companies' Preparation for and Response to Tropical Storm Isaias; (December 10, 2020 Letter Ruling on Motion No. 42) (protecting bulk third-party contractor invoices); Docket No. 19-03-01, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company (July 19, 2019 Letter Ruling to Motion No. 5) (protecting bulk invoices and facility and generation data in its entirety).

[2] See Procedural Order at 2 (stating "parties and intervenors may not submit bulk filings confidentially without a redacted version submitted publicly. However, a party or intervenor may file a motion requesting to only submit the bulk filings confidentially in extraordinary circumstances.")

transparency consistent with applicable law. For these reasons, CL&P is making arrangements to comply with the Order.

The Company's challenge is that it has determined that it will not be feasible to use an automated redaction service to complete this work due to the disparate nature of the documents and the nature of the information subject to redaction, primarily because computer-assisted technology cannot identify and redact the confidential data. The sensitive data is interwoven throughout the documents and the documents do not present data in a singular standard template. There is also substantial variation in the documentation – among vendors and as a result of changing bill formats over the 2017 to 2025 time horizon. Even if a service could be retained to do the work, it would be very costly and still necessary to carefully review the work for accuracy, essentially duplicating the work effort. Accordingly, the Company has come to the conclusion that the documentation will need to be manually redacted, which is a very significant effort to undertake at this late date.

To comply with the Procedural Order, therefore, the Company is establishing staffing to implement the redactions, including assistance from the Military Spouse Managed Review ("MSMR") initiative, which is comprised of legal professionals whose spouses serve in the U.S. military that provide "managed document review solutions".[3] Time will be needed to complete this work with the available resources. Therefore, the Company proposes to submit the confidential versions of the respective documentation as soon as practicable – and thereafter – to produce the redacted versions for the public record. The Company should be able to complete the redaction work before the evidentiary hearings so that the redacted documentation may be used at hearing.

[3] See Military Spouse Managed Review (MSMR) | TCDI

The confidential data in the bulk documents falls into different categories. Table 1, below, identifies the different categories of bulk documents and indicates CL&P's proposed deadline to file public, redacted copies. Again, the Company plans to make the confidential information available to PURA and the parties, pending the production of redacted copies at a later date.

Table 1: Proposed Schedule for Producing Public Redacted Copies of Documents

#	Type of Document	Proposed Deadline to Complete Redactions
1	Exhibit CLP-ENV-3(A) – Environmental Remediation Invoices	August 14, 2026
2	Exhibit CLP-REVREQ-4(A) – Third Party Pole Make Ready Invoices	August 31, 2026
3	Exhibit CLP-ACCT-2(A) – Storm Invoices	September 15, 2026
4	Exhibit CLP-ADDITIONS-6 – Capital Project Documentation	October 1, 2026

Table 1, above, reflects that CL&P will move as quickly as reasonably possible to produce redacted versions of confidential documents, but this process will involve a manual, labor intensive, page-by-page review that cannot be completed immediately. Importantly, when PURA evaluates this proposal, CL&P respectfully requests that PURA take into consideration the following factors.

1. The Office of Consumer Counsel and PURA will have immediate access to the bulk documents because all of those documents will initially be filed on a confidential basis when CL&P submits its rate case application on July 14, 2026.
2. The deadlines proposed in Table 1 occur well before the expected date for evidentiary hearings in this docket, which are currently expected to occur in December 2026 and/or January 2027.

3. If a category of bulk documents is redacted sooner than the applicable deadline shown in Table 1 above, then the Company will publicly file those documents sooner.
4. If a party or intervenor needs a specific subset of the confidential bulk documents filed publicly in redacted format sooner, then CL&P will work with them to attempt to reasonably accommodate their needs.
5. At the June 16, 2026 technical meeting in this docket, a party questioned why weren't public, redacted copies of these bulk documents prepared ahead of time? The answer CL&P provided was – because PURA recently ruled in Docket Nos. 25-12-13 and 24-03-30 that bulk confidential documents did not need to be filed in a public redacted format – CL&P reasonably relied on that precedent to expect that PURA would follow the same approach in this docket.[4] Additionally, no statute, regulation, or court decision mandates that once a document satisfies a FOIA exemption from public disclosure that a public redacted copy must be filed. Nor does any statute, regulation, or court decision mandate the timing of when public redacted copies must be filed.

For all of these reasons, CL&P respectfully requests that PURA approve the reasonable timeframes proposed in Table 1, above, to comply with PURA's Procedural Order.

[4] See Docket No. 25-12-13, April 2, 2026 Ruling on Motion No. 36 (PURA protected bulk confidential documentation provided in a folder and subfolder structure, and did not require a public filing version); Docket No. 24-03-30, August 27, 2024 Letter Ruling to Motion No. 17 (PURA protected confidential-only versions of vendor invoices in their entirety to protect the interest of customers in maintaining competitive pricing; Company had also noted that records consisted of 152,000 pages of invoices that would have cost $275,000 to $400,000 to redact, which was not reasonable). See also footnote 1 for a full listing of prior precedent

RESPECTFULLY SUBMITTED,

THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY

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CERTIFICATION

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



Tiffany N. Tisler
Commissioner of the Superior Court