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
	:	SEPTEMBER 30, 2026

OBJECTION OF ALLCO FINANCE LIMITED TO THE COMPANY'S SEPTEMBER 25, 2026 MOTION FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION (ALLCO SET 2)

I. SUMMARY OF POSITION

Allco Finance Limited ("Allco") objects in part to the September 25, 2026 motion of The Connecticut Light and Power Company d/b/a Eversource Energy (the "Company") for protective treatment of four attachments to its responses to Allco's Set Two interrogatories. Allco does not object to protection from public disclosure of the names, contact information, and identification numbers of individual employees (ALLCO-020, Attachment 1; ALLCO-022, Attachment 1, column (a); ALLCO-024, Attachment 1), or of the vendor's bank account and routing numbers (ALLCO-034, Attachment 1). Those are the categories the Authority's Procedural Order Regarding Protected Materials contemplates, and Allco's own interrogatories anticipated that names would be withheld. Allco objects to the remainder of the motion, which uses those uncontroversial categories to carry three things that are not confidential at all: the percentage of Eversource Legal compensation allocated to the Company, by management level (ALLCO-022, Attachment 1, column (i)); the hourly rate and line amounts of a redaction vendor whose charges the Company asks ratepayers to pay (ALLCO-034, Attachment 1); and, by omission, the rate-case-expense materials the Company filed as confidential on September 24 without moving to protect them. Allco also asks that any ruling be expressly without prejudice to Allco's pending Motion No. 62, since nothing in the motion suggests that any of this material should be withheld from Allco's reviewing representatives.

II. ALLCO-022, ATTACHMENT 1: THE ALLOCATION PERCENTAGE IS A RATEMAKING INPUT, NOT A PERSONNEL FILE

ALLCO-022 asked for the cost of the Eversource Legal Department allocated to the Company. The Company's attachment lists positions by management level and employee number, with the percentage of each position's compensation and benefits allocated to the

Company. The motion redacts two columns: employee number (column (a)) and "the percent allocated to CL&P" (column (i)), on the theory that compensation by position "could be easily calculated if only employee numbers were redacted." Motion ¶ 4. That argument proves too much and too little. If compensation by position can be calculated from the public columns, the public columns already disclose it, and redacting the allocation percentage protects nothing personal. What the redaction does conceal is the allocation factor itself — the share of each legal position's cost the Company proposes to charge to Connecticut ratepayers. That is not a "personnel or medical file[]" within Conn. Gen. Stat. § 1-210(b)(2); it is the Company's own cost-allocation methodology, the very subject of the Application, and the public cannot evaluate a rate request whose allocation factors are secret. The rulings the Company cites (Motion ¶ 6) protect individual salary figures; none protects an allocation percentage. Allco asks that the Authority deny protection for column (i) and for any subtotal or total of cost allocated to the Company by management level, and grant it only for column (a) and for any figure that discloses an identifiable individual's compensation.

III. ALLCO-034, ATTACHMENT 1: THE PRICE OF A SERVICE CHARGED TO RATEPAYERS IS NOT A TRADE SECRET

ALLCO-034, Attachment 1 is a one-page invoice from Technology Concepts & Design, Inc. ("TCDI") for redaction and e-discovery services in this docket — 6.5 hours of project management and a monthly hosting fee, total $2,517.50. The public version discloses the total, the hours, and the vendor, and redacts the hourly rate, the hosting fee, and the bank details. Allco has no objection as to the bank details. The rate and fee are another matter. A trade secret under Conn. Gen. Stat. §§ 1-210(b)(5)(A) and 35-51(d) must "derive[] independent economic value … from not being generally known"; the hourly rate of a litigation-support vendor, disclosed on an invoice the Company has chosen to put before the Authority as the basis for recovering the cost from ratepayers, has no such value, and the Dickson affidavit does not say otherwise beyond the generic assertion that disclosure "would adversely impact" vendors in future negotiations. Nor is the rate "given in confidence" under § 1-210(b)(5)(B) in any sense that survives the Company's decision to seek its recovery in rates. Allco recognizes that the Authority has protected negotiated vendor contracts in prior dockets, including contracts for rate case expense (Motion ¶ 10). Two things distinguish this motion. First, the Company contends that this particular cost is not rate case expense at all but ordinary operating cost recoverable notwithstanding Conn. Gen. Stat. § 16-243p(b) (ALLCO-034(d)); a cost the Company says ratepayers must bear as a routine

expense cannot be one whose price ratepayers may not see. Second, the balancing the Company invokes — that "the necessity of withholding public disclosure … outweighs the public interest" (Motion ¶ 15) — is conclusory; the public interest in the unit price of services billed to ratepayers under a statute that forbids their recovery is at its highest, and the necessity is nil for a rate the vendor publishes to every client. Allco asks that protection for ALLCO-034, Attachment 1 be limited to the bank account and routing information.

IV. THE SEPTEMBER 24 RATE-CASE-EXPENSE ATTACHMENTS ARE NOT COVERED BY ANY MOTION

The motion states that "[t]he last item responsive to Allco Set 2 was filed with PURA on September 24, 2026" (Motion ¶ 1) but does not seek protection for it. That item, ALLCO-027, was filed with seven attachments designated CONFIDENTIAL and redacted— Keegan Werlin LLP's October 10, 2025 fee proposal (Attachment 1), the Company's acceptance (Attachment 2), the consultant contracts included in rate case expense (Attachments 4 and 5), the competing proposals (Attachments 7 and 8), and Keegan Werlin's invoices (Attachment 10). Under the Procedural Order, material filed under a claim of confidentiality must be supported by a timely motion; absent one, it is public. The deadline for such a motion was September 28, 2026. Allco gives notice that if the Company moves to protect those attachments, Allco will oppose protection of the fee proposal, the not-to-exceed amount, the hours estimate, the hourly rates, and the invoice detail. The Company has placed approximately $1.875 million of Keegan Werlin fees and approximately $3.1 million of rate case expense in the public revenue requirement (Exhibit CLP-REVREQ-1; REVREQ-9), and the recoverability of that expense under § 16-243p(b) is a public question. The public cannot assess whether the rate case expense the Company seeks to recover is reasonable without knowing what was bid, what was accepted, and what is being billed.

VI. PARTY ACCESS

Protective treatment under the Procedural Order limits public disclosure; it does not limit access by parties who have undertaken to protect the material. The Company's motion does not contend that any of the four attachments should be withheld from Allco's reviewing representatives, and Allco's Motion No. 62, to which the Company responded on September 24 without disputing Allco's entitlement to access, is pending. Allco asks that any ruling on this motion state that it is without prejudice to Motion No. 62 and direct the Company to provide the confidential versions of ALLCO-020, Attachment 1, ALLCO-022, Attachment 1, ALLCO-024,

Attachment 1, and ALLCO-034, Attachment 1 to Allco's reviewing representatives under Allco's executed protective agreement of September 9, 2026 or such form as the Authority prescribes.

VII. RELIEF REQUESTED

Allco respectfully requests that the Authority: (1) grant protective treatment for employee names, contact information, and identification numbers in ALLCO-020, Attachment 1, ALLCO-022, Attachment 1 (column (a)), and ALLCO-024, Attachment 1, and for the bank account and routing information in ALLCO-034, Attachment 1; (2) deny protective treatment for column (i) of ALLCO-022, Attachment 1 and any level-aggregate cost allocated to the Company, and for the rates and line amounts in ALLCO-034, Attachment 1, and direct the Company to file revised public versions within five days; (3) direct the Company to file a public version of ALLCO-020, Attachment 1 showing titles, reporting lines, and headcount with names and contact information redacted; (4) declare that the CONFIDENTIAL attachments to ALLCO-027 are not subject to protective treatment absent a timely motion, or set a date for one; and (5) provide that the ruling is without prejudice to Motion No. 62 and direct production of the confidential versions to Allco's reviewing representatives.

ALLCO FINANCE LIMITED

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CERTIFICATION

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

/s/ Thomas Melone
Thomas Melone