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**

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 September 9, 2026 ("OCC Set 15") and on September 11, 2026 ("OCC Set 17"), and by the New England Connectivity and Telecommunications Association ("NECTA") on September 9, 2026 ("NECTA Set 1"), contain proprietary models, employee and vendor names, proprietary reports, and Critical Energy Infrastructure Information ("CEII"), 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 to OCC Set 15, OCC Set 17, and NECTA Set 1:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
NECTA-015	Attachment 2 CONFIDENTIAL	September 28, 2026	September 28, 2026
NECTA-018	Attachment 1 CONFIDENTIAL	September 23, 2026	September 23, 2026
NECTA-020	Attachment 3 CONFIDENTIAL	September 23, 2026	September 23, 2026
NECTA-021	Attachment 1 CONFIDENTIAL	September 23, 2026	September 23, 2026
NECTA-022	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	September 23, 2026	September 23, 2026
NECTA-025	Attachment 2 CONFIDENTIAL	September 23, 2026	September 23, 2026
NECTA-028	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	September 23, 2026	September 23, 2026
NECTA-031	Attachment 2 CONFIDENTIAL	September 24, 2026	September 24, 2026
NECTA-044	Attachment 2 CONFIDENTIAL	September 24, 2026	September 24, 2026
NECTA-045	Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL	September 23, 2026	September 23, 2026
OCC-591	Attachment 1 CONFIDENTIAL	September 23, 2026	September 23, 2026
OCC-594	Attachment 2 CONFIDENTIAL	September 28, 2026	September 28, 2026
OCC-596	Attachment 4 CONFIDENTIAL	N/A – Filed as Confidential only	September 23, 2026
OCC-599	Attachment 1 CONFIDENTIAL	September 23, 2026	September 23, 2026
OCC-602	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	September 28, 2026	September 28, 2026
OCC-729	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	N/A – Filed as Confidential only	September 28, 2026

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on September 23, 2026; September 24, 2026; and September 28, 2026. The last item responsive to OCC Set 15 was filed with PURA on September 28, 2026. The last item responsive to OCC Set 17 was filed with PURA on

September 28, 2026. The last item responsive to NECTA Set 1 was filed with PURA on September 29, 2026.

Employee Names

2. NECTA-0015, Attachment 2 CONFIDENTIAL, NECTA-018, Attachment 1 CONFIDENTIAL; NECTA-020, Attachment 3 CONFIDENTIAL; NECTA-021, Attachment 1 CONFIDENTIAL; NECTA-022, Attachments 1 and 2 CONFIDENTIAL; NECTA-025, Attachment 2 CONFIDENTIAL; NECTA-028, Attachments 1 and 2 CONFIDENTIAL; NECTA-044, Attachment 2 CONFIDENTIAL; and NECTA-045, Attachment 1 CONFIDENTIAL through NECTA-045, Attachment 3 CONFIDENTIAL, contain names of 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.

3. This information should be protected from public disclosure pursuant to Item 6(f) of PURA's Revised Procedural Order Regarding Protected Materials, dated September 17, 2026 ("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).

4. PURA has previously protected employee names from public disclosure. 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 to Eversource employee names and contact information ("Docket No. 24-01-03 Motion No. 28 Ruling"). PURA has also previously protected employee names from public disclosure in other instances. See, e.g., Docket No. 26-05-10, Application of Connecticut Light and Power Company d/b/a Eversource Energy to Amend its Rate Schedules (August 2, 2026 Ruling to Motion No. 10) (protecting employee names and contact information); 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 (October 25, 2021 Ruling to Motion No. 7) (protecting employee names, addresses, and telephone numbers).

Third-party Pricing Information and Contract Terms

5. NECTA-031, Attachment 2 CONFIDENTIAL, and NECTA-044, Attachment 2 CONFIDENTIAL, contain confidential vendor pricing and contract term information relating to the Company's third-party vendors. The pricing and negotiated terms from third parties and consultants are confidential and proprietary, and public disclosure of this data would adversely impact the third parties and consultants in their pending and future negotiations to perform like services for other companies. The information on terms, fees, and rates contained in these attachments include proprietary, competitive, and commercially sensitive information that is non-public information. Public disclosure of this information would cause substantial harm to the Company and its vendor. Negotiated contract terms, pricing, and unit cost terms obtained by the Company from vendors are provided with an expectation of privacy and must be protected from public disclosure to ensure competitive market pricing.

6. Pursuant to Item 6(b) of PURA's Revised Procedural Order and Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in response to NECTA-031, Attachment 2

CONFIDENTIAL, and NECTA-044, Attachment 2 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).

7. PURA has previously approved requests to protect similar negotiated pricing and contract information as confidential. See, Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Dec. 18, 2024 Ruling on Motion No. 5) (protecting as confidential negotiated third-party vendor pricing and agreements); Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Apr. 14, 2025 Ruling on Motion No. 54) (protecting as confidential negotiated insurance coverages, sub-limits, and retentions); Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend their Rate Schedules (Nov. 26, 2023 Ruling on Motion No. 12 and Dec. 22, 2023 Ruling on Motion No. 29) (protecting as confidential third-party vendor agreement); Docket No. 14-07-19RE07, PURA Investigation into Redesign of the Residential Electric Billing Format – Cost Allocation Among Suppliers for System Redesign and Associated Costs (July 21, 2022 Ruling on Motion No. 3) (protecting third-party vendors' pricing data as commercially sensitive, confidential, and proprietary); 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 Ruling on Motion No. 10) (approving motion for protective order for rate case expense); (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 with 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) (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) (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) (confidential vendor pricing information).

CEII

8. Pursuant to Item 6(d) of PURA's Revised Procedural Order and Conn. Gen. Stat. § 1-210(b)(19), OCC-591, Attachment 1 CONFIDENTIAL, OCC-594, Attachment 2 CONFIDENTIAL, OCC-599, Attachment 1 CONFIDENTIAL, and OCC-602, Attachments 1 and 2 CONFIDENTIAL, contain CEII of the Company's electric distribution system[1]. Section 1-210(b)(19) exempts from public disclosure "[r]ecords when there are reasonable grounds to believe disclosure may result in a safety risk, including the risk of harm to any person, any

[1] 18 C.F.R. § 388.113(c)(2) defines CEII: "Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that" (i) Relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) Could be useful to a person in planning an attack on critical infrastructure; (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552; and (iv) Does not simply give the general location of the critical infrastructure."

government owned or leased institution or facility or any fixture or appurtenance and equipment attached to, or contained in, such institution or facility[.]" Section 1-210(b)(19) defines "government-owned or leased institution or facility" as including a "facility owned or leased by a public service company, as defined in section 16-1[.]"

9. The information provided in these exhibits includes substation, feeder and geographic location of constraints; substation load forecasts; forecast violation years; and 5-year historical peak load data. If disclosed, this information would create a system security risk and provide bad actors with detailed information relating to the Company's infrastructure and jeopardize operation of the Company's system. The Company has redacted substation identifying information from OCC-591, Attachment 1 CONFIDENTIAL, OCC-594, Attachment 2 CONFIDENTIAL, OCC-599, Attachment 1 CONFIDENTIAL, and OCC-602, Attachments 1 and 2 CONFIDENTIAL.

10. OCC-591, Attachment 1 CONFIDENTIAL, OCC-594, Attachment 2 CONFIDENTIAL, OCC-599, Attachment 1 CONFIDENTIAL, and OCC-602, Attachments 1 and 2 CONFIDENTIAL, are exempt from disclosure pursuant to Federal Energy Regulatory Commission ("FERC") procedure, which requires specific procedures for the handling of CEII. FERC procedure requires that any sharing of CEII is for a legitimate purpose and done in such a manner to ensure that CEII is not placed in the public domain. See 18 C.F.R. § 388.113. Public disclosure of CEII would be contrary to standards established by FERC that are aimed at protecting the security, public health and safety, and economic security of the United States. The Company also asks that recipients of such CEII be required to abide by existing best practices for maintaining the security of CEII.[2]

[2] For example, (i) recipients of CEII may only discuss CEII with another recipient of the identical CEII, (ii) recipients of CEII may use CEII as foundation advice provided to others but may not disclose CEII to another

11. PURA has granted similar requests to maintain information such as the CEII contained in OCC-591, Attachment 1 CONFIDENTIAL, OCC-594, Attachment 2 CONFIDENTIAL, OCC-599, Attachment 1 CONFIDENTIAL, and OCC-602, Attachments 1 and 2 CONFIDENTIAL, as confidential. See Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend Its Rate Schedules, (December 18, 2024 Ruling to Motion No. 5) (protecting as confidential Yankee's CEII); Docket No. 16-06-04, Application of The United Illuminating Company to Increase Rates and Charges (August 9, 2016 Order on Motion No. 10) (protecting as confidential critical energy infrastructure information); Docket No. 13-01-19, Application of The United Illuminating Company to Increase Rates and Charges (Apr. 16, 2013 Order on Motion No. 9; Apr. 30, 2013 Order on Motion No. 13) (protecting as confidential critical energy infrastructure information).

Confidential Consultant Models

12. OCC-729, Attachments 1 and 2 CONFIDENTIAL, are variations on Ms. Amparo Nieto's working models, identified as the Allocated Cost of Service Study ("ACOS"). These models were created, developed, and are maintained by Ms. Nieto. The models were created utilizing her proprietary knowledge and are protected as her intellectual property. Ms. Nieto informed CL&P that her know-how to perform the studies is highly proprietary and confidential and that her models have substantial commercial value and are proprietary to their consulting services. The commercial value of these models would be substantially reduced if they were made publicly available to any parties including other consultants who compete with her to provide similar consulting services. For this reason, Ms. Nieto does not disclose the models publicly and

individual unless that individual is an approved CEII recipient of the same CEII, (iii) recipients of CEII will not use it for an illegal or non-legitimate purpose, and (iv) the CEII is to be maintained in a secure place with access limited to CEII recipient of the identical material.

she requires that CL&P provide the Excel models as confidential-only exhibits. Ms. Nieto informed CL&P that she previously had the same models containing her proprietary formulas protected as confidential in other jurisdictions, including in New Hampshire, New York, and Illinois.

13. OCC-729, Attachments 1 and 2 CONFIDENTIAL, are confidential pursuant to Item 6(j) of PURA's Revised Procedural Order. In addition, PURA has previously protected from public disclosure the proprietary and confidential models and formulae developed by third party consultants. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend Its Rate Schedules, (December 18, 2024 Ruling to Motion No. 5) (protecting LEI's similar models filed in CL&P's affiliate's recent rate case); Docket No. 23-08-32, Application of the Connecticut Water Company to Amend Its Rate Schedule (November 16, 2023 Ruling on Motion No. 11) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Oct. 18, 2022 Ruling on Motion No. 18) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 22-07-01, Application of Aquarion Water Company of Connecticut to Amend its Rate Schedules (Sept. 9, 2022 Ruling on Motion No. 7) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 18-08-14RE01, PURA Review of the Combined Heat and Power Project Solicitation Pursuant to Conn. Gen. Stat. § 16-258e (September 20, 2022 Ruling to Motion No. 2) (protecting the excel spreadsheets containing model formula and inputs developed by a third party consultant) (see also August 10, 2022 Ruling to Motion No. 29 in the originating docket, Docket No. 18-08-14); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend Rate

Schedules (Sept. 19, 2014, Ruling on Motion No. 43) (protecting third-party consulting firm's confidential and proprietary database of industry statistics developed and maintained by the consulting firm).

Proprietary Reports

14. OCC-596, Attachment 4 CONFIDENTIAL, provides a confidential and proprietary report, which was received through paid subscriptions of Eversource Energy. Specifically, OCC-596, Attachment 4 CONFIDENTIAL, contains an entirely confidential, third-party report provided to the Company through subscription-based data services and platforms, which allow subscribing customers access to various proprietary documents, in exchange for a subscription fee. The Company has subscriptions to receive these reports.

15. As part of its subscriptions, it is required the recipients maintain as confidential and proprietary all data, materials, and publications it receives from its subscriptions and not to release publicly the databases or publications or any of the material contained in them. All vendors operate under a business model, which is to provide data access and publications to persons that purchase subscriptions for a fee. This subscription business model is based on the expectation that only paying subscribers will have access to the databases and publications. If the report in OCC-596, Attachment 4 CONFIDENTIAL, was disclosed to the general public, it would violate the terms of the Company's subscriptions and harm these companies' business interests because individuals and entities that seek access to this information would be able to access it without having to pay for a subscription. This would harm the Company, and its providers, because it could limit future access to the subscription databases and financial publications due to potential competitive disadvantages that could arise, which would deprive the Company of information vital to conducting its business. Therefore, the Company is submitting this document as confidential only.

16. In prior proceedings, PURA has protected from public disclosure proprietary and confidential databases and data developed and maintained by third-party vendors with the expectation that only paying subscribers and customers would have access to that information, in recognition of the data's substantial commercial value. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (March 5, 2025 Ruling to Motion No. 51) (granting confidential treatment to investor analyst reports filed in confidential only version); 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. 12) (approving confidential treatment for non-public subscription-based data); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend its Rate Schedules (July 22, 2014 Letter Order granting Motion No. 25) (protecting from public disclosure survey data from a third-party vendor whose business plan is to provide access to the data only to paying subscribers); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend its Rate Schedules (September 19, 2014 Letter Order granting Motion No. 43) (protecting from public disclosure information provided in response to Q-LF-12 from a third-party vendor's confidential database).

17. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information 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).

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

19. The Confidential Information is exempt from disclosure under Conn. Gen. Stat. §1-210(b), as described herein.

20. Additionally, pursuant to the Revised Procedural Order, the Confidential Information is the type of information that is typically subject to protected treatment, including employee names, negotiated contract terms, CEII, and confidential and proprietary information.

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

22. 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.

23. 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 September 30, 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