STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

RE:	**APPLICATION OF CL&P DBA**	**:**	**DOCKET NO. 26-10-05**
	EVERSOURCE ENERGY TO	**:**	
	AMEND ITS RATE SCHEDULES	**:**	**MAY 28, 2026**

MOTION OF THE OFFICE OF CONSUMER COUNSEL FOR TECHNICAL MEETING OR PRE-FILING GUIDELINES

The Office of Consumer Counsel ("OCC") respectfully submits this Motion to the Public Utilities Regulatory Authority ("Authority"). On May 5, 2026, the Connecticut Light and Power Company dba Eversource Energy ("Eversource") filed an undocketed correspondence regarding "modifications to the filing procedures traditionally followed for rate applications."[1] Eversource Correspondence, p. 1. On May 13, 2026, OCC and the Office of Education, Outreach, and Enforcement ("EOE") filed responses as undocketed correspondence, explaining their concerns with Eversource's proposal.[2]

After further discussions with Eversource, it appears specific guidance from the Authority is necessary to ensure Eversource's initial rate case filing and subsequent record evidence is as public and transparent as possible. OCC is concerned that Eversource's rate application will contain significant volumes of confidential filings, whereby only some minority portions of those bulk filings would contain protected material and the majority remainder otherwise subject to disclosure. As both OCC and EOE explained in their correspondences, there is no legal mechanism permitting bulk confidential filings. To the extent such filings have been permitted in the past, it appears they might not have been legally compliant. General Statutes § 1-210(a) states, "Except as otherwise provided by any federal law or state statute, all records maintained or kept on file by any public agency, whether or not such records are required by any law or by any rule or regulation, shall be public records and every person shall have the right to" inspect and copy such records. Conn. Agencies Regs. § 16-1-34 sets forth the items contained in the record in a contested proceeding, and these include "all written evidence of any kind" as well as interrogatory responses and a variety of other filings that must be "maintained by the Authority in the custody of the executive secretary.

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[1] Eversource's filing may be found here: https://www.dpuc.state.ct.us/DPUCUndocketed.nsf/c8f9534162d6bc06852588cb0069a8e4/8ec05b3ff38389b185258dee006bba2a/$FILE/Eversource%20Letter%20re%20Adjustments%20to%20Rate%20Case%20Filing%20Process%2005.05.26.pdf

[2] OCC's response may be found here: https://www.dpuc.state.ct.us/DPUCUndocketed.nsf/c8f9534162d6bc06852588cb0069a8e4/caa0f32491701a4485258df6006d8a1f/$FILE/Response%20to%20Eversource%20Undocketed%20Correspondence.pdf. EOE's response may be found here: https://www.dpuc.state.ct.us/DPUCUndocketed.nsf/c8f9534162d6bc06852588cb0069a8e4/fc9cd65d419bf7e785258df6004a2ff9/$FILE/EOE%20Response%20to%20ES%20Undocketed%20Corr.pdf

Consistently, the Authority has permitted parties to redact specific parts of filings based on Freedom of Information Act ("FOIA") exemptions. *See* General Statutes § 1-210(a). Basing confidentiality on FOIA is essentially a procedural shortcut; the Authority's Rules of Practice[3] do not include provisions for confidential submissions, so the Authority allows confidential submissions of material that might be protected under FOIA were someone to submit a FOIA request to the Authority or other state agencies for such information.[4] There are no FOIA exemptions for bulk filings or voluminous material. *See* General Statutes § 1-210(a).

OCC is concerned that Eversource's rate application will contain significant volumes of bulk confidential filings. A rate application, particularly one seeking a large rate increase, should be publicly available and accessible to any and all interested members of the public. The ratepayers, for whom Eversource is seeking to increase rates, should be able to fully understand why their rates are proposed to increase and what they are paying for. Bulk confidential filings do not permit this. As OCC explained in its undocketed correspondence, it is not trying to be unreasonable, but ratepayers must be considered and Eversource had ample time, years in fact, to have redacted the material before it files its rate application.

Based on this concern and on other filing procedures requested in Eversource's undocketed correspondence (*e.g.*, filing material in folders, etc…), OCC believes a technical meeting to determine an appropriate path forward before Eversource files the rate application could benefit all parties.[5] In the alternative, OCC respectfully requests that the Authority issue guidance on the topics discussed in the undocketed correspondences prior to Eversource filing the rate application. OCC submits that addressing these procedural matters upfront will be most efficient for all parties and the Authority. OCC thanks the Authority for its consideration.

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[3] The Authority's Rules of Practice may be found at Conn. Agencies Regs. § 16-1-1 *et seq*.

[4] Eversource recently implied in Docket No. 26-08-08 that FOIA does not apply to Eversource as a private party. Docket No. 26-08-08, Motion No. 7, p. 3-4. This is correct. FOIA applies only to state parties. Under such logic, it is the Authority's right to claim, or not claim, a FOIA exemption for any material in its dockets and it is not clear how any non-state party can argue that a FOIA exemption applies to its filing. As Eversource admitted, the practice exists solely because it "is a mutually beneficial practice for both PURA and the proponents of confidential information." *Id*. at p. 4. Moreover, as OCC explained in its undocketed correspondence, since it is the Authority's right to assert the FOIA exemption for material in its dockets, it is equally the Authority's responsibility to redact the filing when providing it in response to a FOIA request. To the extent Eversource is attempting to avoid work, it is passing on that work to the Authority if someone requests the filing under FOIA.

[5] For example, although OCC and EOE were able to articulate to Eversource their thoughts regarding the folder structure, neither knows how the Authority staff engages with material in the docket or what structure might best work for them.

Respectfully submitted,
STATE OF CONNECTICUT
OFFICE OF CONSUMER COUNSEL

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CERTIFICATE OF SERVICE

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

Dated at New Britain, Connecticut this 28th day of May, 2026.

/s/*Andrew W. Minikowski*

Commissioner of the Superior Court