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**
		OCTOBER 19, 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 25, 2026 ("OCC Set 22") and by the Office of Education, Outreach, and Enforcement (the "EOE") on September 25, 2026 ("EOE Set 7") contain employee names and contact information, confidential Requests for Proposals ("RFPs") and bid evaluations, third-party pricing information and contract terms, and customers' individually identifiable information, 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 EOE Set 7 and OCC Set 22:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
EOE-335	Attachment 1 CONFIDENTIAL	October 14, 2026	October 14, 2026
EOE-354	Attachment 1 CONFIDENTIAL	N/A – Filed as Confidential only	October 9, 2026
EOE-354	Attachment 2 CONFIDENTIAL	October 9, 2026	October 9, 2026
EOE-363	Attachment 1 CONFIDENTIAL	October 9, 2026	October 9, 2026
EOE-376	Attachment 1 CONFIDENTIAL*	October 14, 2026	October 14, 2026
OCC-874	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
OCC-876	Attachment 1 CONFIDENTIAL	October 16, 2026	October 16, 2026
OCC-879	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 9, 2026	October 9, 2026
OCC-880	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL Attachment 3 CONFIDENTIAL Attachment 5 CONFIDENTIAL	October 9, 2026	October 9, 2026
OCC-881	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 11, 2026	October 11, 2026
OCC-882	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 9, 2026	October 9, 2026

* The confidential attachment to EOE-376 is redacted for relevance.

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on October 9, 2026; October 11, 2026; October 14, 2026; and October 16, 2026. The last item responsive to EOE Set 7 was filed with PURA on October 15, 2026 and the last item responsive to OCC Set 22 was filed with PURA on October 19, 2026.

Third-party Pricing Information and Contract Terms

2. OCC-874, Attachment 1 CONFIDENTIAL; OCC-879, Attachment 2 CONFIDENTIAL; and OCC-882, Attachment 2 CONFIDENTIAL, contain confidential vendor pricing and contract term information relating to the Company's third-party vendors. Specifically,

these attachments contain vendor-specific invoices, contracts, pricing schedules, and pricing spreadsheets. The pricing and negotiated terms from third parties and consultants are confidential and proprietary, and public disclosure of this information 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 vendors. 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.

3. Pursuant to Item 6(b) of PURA's Revised Procedural Order Regarding Protected Materials, dated September 17, 2026 ("Revised Procedural Order") and Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in response to OCC-874, Attachment 1 CONFIDENTIAL; OCC-879, Attachment 2 CONFIDENTIAL; and OCC-882, Attachment 2 CONFIDENTIAL, qualify 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).

4. PURA has approved requests to protect negotiated pricing and contract information as confidential. See, Docket No. 26-05-10 (Aug. 3, 2026 Ruling on Motion No. 10 at 4-5) (protecting as confidential negotiated contract terms, pricing, and unit cost information); (Sept. 24, 2026 Ruling on Motion No. 10 at 3-4) (protecting as confidential negotiated contract terms, pricing, and unit cost information); 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).

Confidential Requests for Proposals and Bid Evaluations

5. EOE-363, Attachment 1 CONFIDENTIAL, contains specific term and condition information provided to Eversource for services to be rendered in response to the Company's RFP. The Confidential Information in EOE-363, Attachment 1 CONFIDENTIAL, includes 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. EOE-363, Attachment 1 CONFIDENTIAL, also includes confidential terms and conditions that are not disclosed publicly. This information has been anonymized to protect the confidentiality of the vendor bids.

6. Additionally, EOE-363, Attachment 1 CONFIDENTIAL, provides evaluation of the vendor bids provided in response to the RFP. 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 Item 6(b) of the Revised Procedural Order and Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in EOE-363, Attachment 1 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).

Employee Names and Contact Information

9. EOE-335, Attachment 1 CONFIDENTIAL; EOE-376, Attachment 1 CONFIDENTIAL; OCC-874, Attachment 1 CONFIDENTIAL; OCC-876, Attachment 1 CONFIDENTIAL; OCC-879, Attachments 1 and 2 CONFIDENTIAL; OCC-880, Attachments 1, 2, 4, and 5 CONFIDENTIAL; OCC-881, Attachments 1 and 2 CONFIDENTIAL; and OCC-882, Attachments 1 and 2 CONFIDENTIAL, contain names and contact information for 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. Further, EOE-376 Attachment 1 CONFIDENTIAL is redacted for relevance because it contains information regarding affiliates outside of Connecticut and affiliates not subject to PURA's regulation; such information is not germane to this proceeding.

10. 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).

11. 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 Eversource employee names and contact information pursuant to Section 1-210(b)(5)(B). See, 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).

Customer Individually Identifiable Information

12. EOE-354, Attachments 1 and 2 CONFIDENTIAL, and EOE-376, Attachment 1 CONFIDENTIAL, contain specific customer account information and customer identifying information, including customer names, account numbers, as well as financial information relating to specific customers and adjustments made to their bills. The Company does not disclose customer information, including customer calls, account numbers, or financial information of customers to the public. Any public disclosure of the Company's customer information would harm their privacy interests.

13. Customer information is protected from public disclosure pursuant to Item 6(a) of PURA's Revised Procedural Order. Further, Connecticut law and Company policy prohibit the Company from publicly disclosing information about its customers without such customers' written consent. See, e.g., Conn. Agencies Regs. § 42-471(a) (stating that "[a]ny person in possession of personal information of another person shall safeguard the data, computer files and documents containing the information from misuse by third parties."). "Personal information" is defined as "information capable of being associated with a particular individual through one or more identifiers, including, but not limited to … an account number, a credit or debit card number, … and does not include publicly available information that is lawfully made available to the general public from federal, state or local government records or widely distributed media." Conn. Gen. Stat. § 42-471(c); see also, Docket No. 98-06-13, DPUC Report to the General Assembly on Aggregation (Dec. 23, 1998 Decision at 12) (stating that "[c]ustomers have certain privacy rights under federal and state law that protect them from any harm that may result from unauthorized release or use of personal information.").

14. If the Company were to publicly disclose EOE-354, Attachments 1 and 2 CONFIDENTIAL, and EOE-376, Attachment 1 CONFIDENTIAL, absent the consent of each affected customer, the Company could be exposed to legal claims from such customers, including but not limited to, complaints made to the Office of the Attorney General and the Connecticut Department of Consumer Protection.

15. PURA has routinely protected from public disclosure customer call recordings and account-specific information of utility customers. See, Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (May 20, 2025 Ruling on Motion No. 95) (protecting from public disclosure customer call recordings); Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend their Rate Schedules (Dec. 6, 2023 Ruling on Motion No. 23) (protecting from public disclosure customer call recordings); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Feb. 15, 2023 Ruling on Motion No. 53) (protecting as confidential recordings of customer calls); Docket No. 20-03-15, Emergency Petition of William Tong, Attorney General for the State of Connecticut, for a Proceeding to Establish a State of Emergency Utility Shut-off Moratorium (Jan. 13, 2022 Ruling on Motion No. 62) (protecting audio recordings of phone calls between the companies' customer service representatives and customers). Additionally, PURA has previously protected from public disclosure account-specific information of utility customers. See, e.g., Docket No. 22-08-08 (Oct. 6, 2022 Ruling on Motion No. 8) (protecting as confidential customer account specific information); Docket No. 20-08-03, PURA Investigation into Electric Distribution Companies' Preparation and Response to Tropical Strom Isaias (Dec. 7, 2020 Ruling on Motion No. 32) (protecting as confidential customer-specific information), (Dec. 8, 2020 Ruling on Motion No.

36) (protecting as confidential customer-specific information); Docket No. 17-05-42, Application of The Southern Connecticut Gas Company to Increase its Rates and Charges (Aug. 23, 2017 Ruling on Motion No. 9) (protecting as confidential customer and confidential contact information); Docket No. 11-02-01, Semi-Annual Reconciliation of The Connecticut Light and Power Company's and The United Illuminating Company's Federally Mandated Congestion Costs and Generation Services Charge (April 11, 2011 Ruling on Motion No. 6) (protecting from public disclosure customer names, account numbers, usage data and billing detail).

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

17. The Confidential Information is exempt from disclosure under the FOIA exemptions in Conn. Gen. Stat. §1-210(b), as described herein.

18. 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, internal vendor bid evaluations, and third-party pricing information and contract terms.

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

20. 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.

21. 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 October 19, 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