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 17, 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 August 25, 2026 ("OCC Set 10"), contain confidential customer information and employee names, 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 10:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
OCC-451	Attachment 1 CONFIDENTIAL*	N/A – Filed as Confidential only**	September 15, 2026
OCC-451	Attachment 2 CONFIDENTIAL Attachment 3 CONFIDENTIAL	September 15, 2026	September 15, 2026

* The Excel file for OCC-451, Attachment 1 was filed on September 15, 2026. The Company followed up with a PDF version on September 16, 2026.

** EOE-451, Attachment 1 CONFIDENTIAL is being provided as confidential-only for the time being, but the Company anticipates undertaking a significant redaction project to provide this attachment into the public record. This attachment contains approximately 7,000 or more pages that must be manually redacted to provide a public-facing version.

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on August 15, 2026. The last response to OCC Set 10 was filed with PURA on August 15, 2026.

Customer Information

2. OCC-451, Attachment 1 CONFIDENTIAL through OCC-451, Attachment 3 CONFIDENTIAL contain confidential customer information. OCC-451, Attachment 1 CONFIDENTIAL is an extract of all customer service Quality Assurance Program scorecards completed for both internal and external resources from January 1, 2025, through December 31, 2025. OCC-451, Attachments 2 and 3 CONFIDENTIAL are samples of Quality Assurance Program scorecards to aid in understanding the provided export. OCC-451, Attachment 1 CONFIDENTIAL through OCC-451, Attachment 3 CONFIDENTIAL include call evaluations that contain specific customer account information and customer identifying information, including customer account numbers and customer phone numbers. The Company does not disclose customer information, including account numbers, or phone numbers, to the public. Any

public disclosure of the Company's customer information would harm their customers' privacy interests.

3. 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) which states 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, at 12 (Dec. 23, 1998 Decision) (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.").

4. If the Company were to publicly disclose OCC-451, Attachment 1 CONFIDENTIAL through OCC-451, Attachment 3 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.

5. 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).

Employee Names

6. OCC-451, Attachment 1 CONFIDENTIAL through OCC-451, Attachment 3 CONFIDENTIAL contain names for individual Eversource employees. 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 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. 24-03-01, Annual Review of the System Expansion Reconciliation Mechanisms (July 22, 2024 Ruling to Motion No. 4) (protecting employee 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).

7. Employee names 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. Accordingly, this information should be protected from public disclosure pursuant to 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).

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

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

10. Additionally, pursuant to PURA's July 10, 2026 Procedural Order Regarding Protected Materials in this docket, the Confidential Information is the type of information that is typically subject to protected treatment, including customers' individually identifiable information and employee names.

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

12. 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.

13. 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

By: *Vincent P. Pace*

Vincent P. Pace
Daniel T. Crisp
Lauren H. Bidra
Eversource Energy
P.O. Box 270
Hartford, CT 06410-0270
Phone: 860-665-5426
Vincent.Pace@eversource.com
Daniel.Crisp@eversource.com
Lauren.Bidra@eversource.com

By: S. Pardee

Sarah A. Pardee
Keegan Werlin LLP
1 Liberty Square, 3rd Fl.
New Britain, CT 06051
Phone: (617) 951-1400
SPardee@keeganwerlin.com

Its Attorneys

CERTIFICATION

I hereby certify that on September 17, 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