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**
		NOVEMBER 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 an interrogatory issued by the Connecticut Industrial Energy Consumers ("CIEC") on October 29, 2026 ("CIEC Set 9") contains third-party pricing information and contract terms, 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 attachment to an interrogatory in CIEC Set 9:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
CIEC-038	Attachment 1 CONFIDENTIAL	November 12, 2026	November 13, 2026

CIEC-038, Attachment 1 CONFIDENTIAL, was submitted by email to PURA on November 13, 2026.[1]

Third-party Pricing Information and Contract Terms

2. CIEC-038, Attachment 1 CONFIDENTIAL, contains confidential vendor pricing and contract term information relating to the Company's third-party vendors. Specifically, the attachment contains negotiated terms between the Company and a third-party vendor. 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 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 CIEC-038, Attachment 1 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

[1] CIEC-038 was submitted for filing via the PURA website on November 12, 2026. However, due to the Outlook outage experienced on November 12, 2026, the Company was unable to distribute CIEC-038, Attachment 1 CONFIDENTIAL, until the following day, November 13, 2026.

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).

5. Attachment CIEC-038, Attachment 1 CONFIDENTIAL, is maintained by the Company as confidential and has not been disclosed or released to the public.

6. Attachment CIEC-038, Attachment 1 CONFIDENTIAL, is exempt from disclosure under Conn. Gen. Stat. §§1-210(b)(5)(A) and (b)(5)(B) as described herein.

7. Additionally, pursuant to the Revised Procedural Order, CIEC-038, Attachment 1 CONFIDENTIAL, is the type of information that is typically subject to protected treatment, specifically negotiated contract terms.

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

9. 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 CIEC-038, Attachment 1 CONFIDENTIAL, described in this motion.

10. 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 November 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