Date Filed: October 22, 2026

Witness: Counsel
Request from: ALLCO

Question:

(The intervenor non-disclosure agreement.) With respect to the form of "Non-Disclosure Agreement with Data Security Requirements" the Company has required of intervenors in this docket: (a) identify each party, intervenor, consultant, or other person that has executed it, with the date; (b) identify each person who has received confidential information or CEII in this docket without executing it, and the instrument under which that person received it; (c) state whether the Office of Consumer Counsel, the Office of the Attorney General, the Authority's staff, or their consultants are subject to any restriction on the use of AI Tools with Company confidential information in this docket and, if so, identify it; (d) identify by title the "I.T. professionals" referred to in Motion No. 10, Attachment A ¶ 2, and state the criteria the Company proposed to apply in determining whether "appropriate safeguards" exist for the use of an AI Tool with confidential information, and whether the Company has applied those criteria to its own use of AI Tools; (e) identify each concrete risk to confidential information or CEII that the Company contends is created by an intervenor's use of an AI Tool licensed under terms that prohibit retention of and training on inputs and that is not created by the same intervenor's use of a word processor, e-mail system, or document-hosting platform, and each document on which that contention rests; and (f) identify each ruling of the Authority in any docket that has imposed a restriction on the use of AI Tools with protected material.

Response:

No party, intervenor or individual has received confidential or CEII information from the Company without signing the non-disclosure agreement required by the Company. The Company does not allow its confidential information to be used in AI tools by any entity and expects that all entities that have signed a non-disclosure agreement with the Company will honor that request. The Company has not used any AI tools in developing its initial filing, including all testimonies, exhibits and documentation, nor in answering any discovery response. The Company is not aware of jurisdiction that PURA has to dictate the Company's policies on the use of AI in its business enterprise.