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 4, 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 PURA on August 19, 2026 ("PURA Set 2"), and by the Office of Consumer Counsel the ("OCC") on August 11, 2026 ("OCC Set 4") and on August 12, 2026 ("OCC Set 5"), contains Critical Energy Infrastructure Information ("CEII")[1], proprietary consultant materials, internal audits, settlement agreement information, employee and vendor names and contact information, third-party pricing and negotiated contract terms, and banking information which the Company does not disclose publicly.

[1] 18 C.F.R. § 388.113(c)(2) defines CEII: "Critical energy infrastructure information means specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that" (i) Relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) Could be useful to a person in planning an attack on critical infrastructure; (iii) Is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552; and (iv) Does not simply give the general location of the critical infrastructure."

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 PURA Set 2, OCC Set 4, and OCC Set 5:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
OCC-276	Attachment 1 CONFIDENTIAL	August 25, 2026	August 25, 2026
OCC-307	Attachment 1 CONFIDENTIAL through Attachment 52 CONFIDENTIAL*	N/A – Filed as Confidential only	September 1, 2026
OCC-308	Attachment 1 CONFIDENTIAL	September 1, 2026	September 1, 2026
OCC-346	Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL	September 4, 2026	September 4, 2026
OCC-365	Attachment 14 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026
OCC-365	Attachment 15 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026
OCC-365	Attachment 16 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026
OCC-365	Attachment 18 CONFIDENTIAL	September 1, 2026	September 1, 2026
OCC-365	Attachment 19 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026
OCC-365	Attachment 24 CONFIDENTIAL	September 1, 2026	September 1, 2026
OCC-365	Attachment 33 CONFIDENTIAL	N/A – Filed as Confidential only	September 1, 2026
OCC-366	Attachment 2 CONFIDENTIAL	August 28,2026	August 28,2026
OCC-366	Attachment 3 CONFIDENTIAL	August 28,2026	August 28,2026
OCC-376	Attachment 2 CONFIDENTIAL	August 28,2026	August 28,2026
OCC-384	Attachment 1 CONFIDENTIAL	August 28,2026	August 28,2026
OCC-391	Attachment 1 CONFIDENTIAL	August 28,2026	August 28,2026
OCC-394	Attachment 2 CONFIDENTIAL	September 2, 2026	September 2, 2026
RRU-004	Attachment 1 CONFIDENTIAL	September 2, 2026	September 2, 2026

* Certain confidential attachments to EOE-307 are redacted for relevance.

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on August 25, 2026, August 28, 2026, September 1, 2026, September 2, 2026, and September 4, 2026. The last item responsive to PURA Set 2 was filed with PURA on September 2, 2026; the last item responsive to OCC Set 4 was filed with PURA on September 4, 2026; and the last item responsive to OCC Set 5 was filed with PURA on September 2, 2026.

Third-party Pricing Information and Contract Terms

2. OCC-366, Attachment 2 CONFIDENTIAL, OCC-384, Attachment 1 CONFIDENTIAL, and OCC-391, Attachment 1 CONFIDENTIAL, contain confidential vendor pricing and contract terms information relating to the Company's third-party vendors. OCC-376, Attachment 2 CONFIDENTIAL, contains confidential negotiated insurance coverages, sub-limits, and retentions that are negotiated between the Company and its insurance contract counterparties. The pricing and negotiated terms from third parties and consultants are confidential and proprietary, and public disclosure of this data 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 vendor. 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. Additionally, OCC-366, Attachment 3 CONFIDENTIAL, and OCC-376, Attachment 2 CONFIDENTIAL, include confidential bank account numbers of the

Company's vendor, which are not disclosed publicly and if disclosed could subject the Company, its vendor, and banking partners to potential fraud and abuse.

3. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in response to OCC-366, Attachment 2 CONFIDENTIAL, OCC-366, Attachment 3 CONFIDENTIAL, OCC-376, Attachment 2 CONFIDENTIAL, OCC-384, Attachment 1 CONFIDENTIAL, and OCC-391, Attachment 1 CONFIDENTIAL, qualify as "trade secrets" for purposes of the Freedom of Information Act. 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). Further, the Confidential Information provided in response to OCC-366, Attachment 2 CONFIDENTIAL, OCC-366, Attachment 3 CONFIDENTIAL, OCC-376, Attachment 2 CONFIDENTIAL, OCC-384, Attachment 1 CONFIDENTIAL, and OCC-391, Attachment 1 CONFIDENTIAL, is commercial or financial information given in confidence, and not required by statute under Conn. Gen. Stat. § 1-210(b)(5)(B).

4. PURA has previously approved requests to protect similar negotiated pricing and contract information as confidential. See, 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. Additionally, PURA has previously protected confidential banking information such as that contained in OCC-366, Attachment 3 CONFIDENTIAL, and OCC-376, Attachment 2 CONFIDENTIAL. See, e.g., 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 bank account numbers and tax identification numbers); Docket No. 18-03-38, PURA Investigation Into the Re-Financing Arrangements of Frontier Communications (June 25, 2019 Ruling on Motion No. 3) (approving protective treatment for non-public financial information); Docket No. 17-06-30, Joint Application of Eversource Energy and Macquarie Utilities Inc. for Approval of a Change of Control (Aug. 24, 2017 Ruling on Motion No. 6) (approving on reconsideration protective treatment for information relating to strategic business 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); 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. 14-01-46, Joint Application of Frontier Communications Corporation and AT&T Inc. for Approval of a Change of Control (Feb. 21, 2014 Ruling on Motion No. 1) (protecting sensitive and proprietary financial information).

Forward-Looking Project Authorization Documents

6. OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, are project authorization documents that contain specific condition assessments and siting of the Company's electric distribution system and other facilities, some of which are not yet constructed (and therefore, are not yet known to the public). The information provided in these exhibits includes transformer and substation names, locations, ages, condition of

the equipment, loading forecast, Company rankings or other assessments, technical justifications; project scopes; potential alternative solutions studied; results of Substation Constructability Reviews; and engineering schematics, maps, photographs, and diagrams. If disclosed, this information would create a system security risk and provide potential bad actors with detailed information relating to the Company's infrastructure and its identified vulnerabilities, thereby jeopardizing operation of the Company's system. Specifically, OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, provide project authorization forms for projects that are not yet completed, and describe existing conditions and circumstances that include current vulnerabilities on the Company's system.

7. The Confidential Information included in OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, includes CEII that is exempt from disclosure pursuant Conn. Gen. Stat. § 1-210(a) via Federal Energy Regulatory Commission ("FERC") procedure, which requires specific procedures for the handling of CEII. FERC procedure requires that any sharing of CEII is for a legitimate purpose and done in such a manner to ensure that CEII is not placed in the public domain. See 18 C.F.R. § 388.113. Public disclosure of CEII would be contrary to standards established by FERC that are aimed at protecting the security, public health and safety, and economic security of the United States. The Company also asks that recipients of such CEII be required to abide by existing best practices for maintaining the security of CEII.[2]

[2] For example, (i) recipients of CEII may only discuss CEII with another recipient of the identical CEII, (ii) recipients of CEII may use CEII as foundation advice provided to others but may not disclose CEII to another individual unless that individual is an approved CEII recipient of the same CEII, (iii) recipients of CEII will not use it for an illegal or non-legitimate purpose, and (iv) the CEII is to be maintained in a secure place with access limited to CEII recipient of the identical material.

8. Further, Conn. Gen. Stat. § 1-210(b)(19) exempts from public disclosure "[r]ecords when there are reasonable grounds to believe disclosure may result in a safety risk, including the risk of harm to any person, any government-owned or leased institution or facility or any fixture or appurtenance and equipment attached to, or contained in, such institution or facility"…as used in this section, "government-owned or leased institution or facility" includes, but is not limited to, "an institution or facility owned or leased by a public service company." The Confidential Information included in OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, meet the definition of records described as exempt by Conn. Gen. Stat. § 1-210(b)(19). The information relates details about the distribution of energy throughout the Company's system, describes vulnerabilities outlined in project filings that could be useful to a person or entity planning an attack on critical infrastructure, and gives specific details about the location of the equipment. Public disclosure of this information creates a safety risk to facilities owned by the Company, as well as potentially resulting in a safety risk for the public.

9. The redactions proposed in OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, are more numerous and cover more information than similar documents for previously completed projects that are afforded protective treatment by PURA. See Docket No. 26-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company (March 10, 2026 Ruling on Motion No. 6) (providing protective treatment to one-line diagrams and transmission-related CEII). However, there is an important difference that must be considered in the context of Conn. Gen. Stat. § 1- 210(b)(19). In Docket No. 26-01-03 and many other PURA proceedings, project authorization documentation is provided for completed projects, where the project itself has removed the vulnerability or risk of damage, and thus there is no existing vulnerability on the system at that location at the time the

documentation is provided. In OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, the projects described are proposed projects, meaning the vulnerabilities exist today. This prospective look at potential projects the Company will implement in the future, providing knowledge of the current system vulnerabilities rather than where vulnerabilities have already been addressed, heightens the safety risk to Eversource's facilities and therefore heightens the sensitivity of the information contained in the Confidential Attachments.

10. In addition to the prospective vs. retrospective context of the information provided in OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, the Company also recognizes the impact of technological advances, particularly Artificial Intelligence ("AI"), on the ability of potential threat actors to access, compile, and organize significant amounts of information across years of public filings in PURA dockets and other communications in mere minutes. Where in the past, an individual or entity would need to spend significant resources manually researching dockets and filings without confidence that they had found all the relevant documents, a series of fairly simple AI scripts can program an agent to search all filings and save the relevant information in minutes, while including a summary of what it had found. The rapid increase of mapping and geographic image technology available to the public online in recent years also increases the possibility of using AI to compare information in OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, to those public images to determine fairly precise locations of equipment shown in those images. These technological advances require the Company and PURA, as well as all public agencies and stakeholders, to rethink the submittal of redacted copies of confidential information in the context of weighing the public interest in the disclosure against the risk of making information publicly available and accessible by AI.

11. PURA has previously granted requests to maintain CEII as confidential. See Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend Its Rate Schedules, (December 18, 2024 Ruling to Motion No. 5) (protecting as confidential Yankee's CEII); Docket No. 16-06-04, Application of The United Illuminating Company to Increase Rates and Charges (August 9, 2016 Order on Motion No. 10) (protecting as confidential critical energy infrastructure information); Docket No. 13-01-19, Application of The United Illuminating Company to Increase Rates and Charges (Apr. 16, 2013 Order on Motion No. 9; Apr. 30, 2013 Order on Motion No. 13) (protecting as confidential critical energy infrastructure information).

12. Further, OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, contain information that derives 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 their disclosure or use, and also constitutes commercial or financial information given in confidence, not required by statute. Specifically, because OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, include many details related to the nature, scoping and anticipated hours of work required for projects that are not yet completed, this information could be inappropriately used by the Company's vendors if released into the public domain.

13. Conn. Gen. Stat. § 1-210(b)(5)(A) and (B) provide exemptions from disclosure for information that "derives 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 their disclosure or use", and is "the subject of efforts that are reasonable under the

circumstances to maintain secrecy"; and information that is "[c]ommercial or financial information given in confidence, not required by statute".

14. While it is rare for forward-looking project authorization documentation to be provided in PURA proceedings, PURA has granted requests to maintain forward-looking financial information in other types of documentation as confidential. See, e.g., Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Nov. 3, 2022 Ruling on Motion No. 22) (protecting as confidential non-public forecast financial information); Docket No. 17-12-03RE11, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review (March 11, 2021 Ruling on Motion No. 11) (approving confidential treatment for non-public financial projections); Docket No. 15-08-28, Application of RCLEC, Inc. For a Certificate of Public Convenience and Necessity to Provide Local Exchange and Interexchange Services in the State of Connecticut (Aug. 25, 2015 Order on Motion No. 1) (financial statements); Docket No. 14-01-46, Joint Application of Frontier Communications Corporation and AT&T Inc. for Approval of a Change of Control (Apr. 10, 2014 Order on Motion No. 13) (non-public financial information and financial analysis); Docket No. 09-12-05, Application of the Connecticut Light and Power Company to Amend its Rate Schedules (Feb. 4, 2010 Order on Motion No. 16) (financial information presented to credit rating agencies).

Internal Audits

15. OCC-307, Attachment 1 CONFIDENTIAL through Attachment 52 CONFIDENTIAL provide internal audits. These reports contain proprietary, commercially sensitive, and non-public business information, including information analyzing and critiquing internal company business strategies, operating practices, and systems that the Company does not disclose to the public. Consistent with long-standing practice, these documents should be treated

confidentially so as not to undermine the integrity of the internal audit process of the Company. The Company conducts audits and benchmarking to determine whether it has appropriate controls in place to manage its various business functions and whether appropriate actions are taken to improve controls or address areas of concern. It is an integral part of the process for employees to provide candid assessments of the subject areas in question, and for the audit reports to provide candid self-assessments of the Company's performance. If there is a possibility that such information could be open to public inspection, the critical self-evaluation that is integral to the audit process, and the integrity of the same would be compromised. Any public disclosure of these reports would have a chilling effect on the audit process, would cause harm to the business interests of the Company in its service to customers and would allow unfair access to sensitive internal information.

16. The Company is providing OCC-307, Attachment 1 CONFIDENTIAL through Attachment 52 CONFIDENTIAL, as confidential-only documents, many of which are also redacted for relevance. Eversource considers these documents highly confidential and does not disclose them publicly. Further, they are redacted for relevance because they contain information regarding affiliates outside of Connecticut and affiliates not subject to PURA's regulation; such information is not germane to this proceeding.

17. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A) and (B), this information "derives 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 their disclosure or use", and is "the subject of efforts that are reasonable under the circumstances to maintain secrecy"; and this information is "[c]ommercial or financial information given in confidence, not required by statute". Conn. Gen. Stat. § 1-210(b)(19), exempts from public

disclosure "[r]ecords when there are reasonable grounds to believe disclosure may result in a safety risk, including the risk of harm to any person, any government-owned or leased institution or facility or any fixture or appurtenance and equipment attached to, or contained in, such institution or facility[.]" Additionally, Conn. Gen. Stat. § 1-210(b)(20) provides that information "the disclosure of which would compromise the security or integrity of an information technology system" is exempt from public disclosure. Neither federal nor Connecticut statutes require that the Company submit this Confidential Information to PURA.

18. PURA's July 10, 2026 Procedural Order Regarding Protected Materials issued in this docket states that internal audit reports, benchmarking analysis, and other non-public business information is typically subject to protected treatment (Procedural Order at 3). Further, PURA has previously granted protected treatment for similar requests to treat audit reports and related information as confidential. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Feb. 18, 2025 Ruling on Motion No. 43) (granting protective treatment to internal audit reports); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Jan. 12, 2023 Ruling on Motion No. 48) (granting protective treatment to audit reports and external benchmarking studies); Docket No. 18-05-16, Application of Connecticut Natural Gas Corporation to Increase its Rates and Charges (August 23, 2018 Ruling on Motion No. 12) (granting protective treatment for internal audit reports); Docket No. 17-05-42, Application of the Southern Connecticut Gas Company to Increase its Rates and Charges (August 23, 2017 Ruling on Motion No. 8) (granting protected status to Internal Audit Department reports); Docket No 13-03-23, Petition of The Connecticut Light and Power Company for Approval to Recover its 2011-2012 Major Storm Costs, (August 8, 2013 Ruling on Motion No. 9) (granting protected status to Internal Audit Department reports);

Docket No. 09-12-05, Application of The Connecticut Light and Power Company to Amend Its Rate Schedules, (April 14, 2010 Ruling on Motion No. 43) (granting confidential treatment to internal audit report).

Employee and Vendor Names and Contact Information

19. OCC-276, Attachment 1 CONFIDENTIAL, OCC-346, Attachment 1 CONFIDENTIAL through Attachment 7 CONFIDENTIAL, OCC-366, Attachment 2 CONFIDENTIAL, OCC-366, Attachment 3 CONFIDENTIAL, OCC-376, Attachment 2 CONFIDENTIAL, OCC-384, Attachment 1 CONFIDENTIAL, OCC-391, Attachment 1 CONFIDENTIAL, OCC-394, Attachment 2 CONFIDENTIAL, and RRU-004, Attachment 1 CONFIDENTIAL contain names and contact information for individual Eversource employees and its vendor's employees. PURA has previously protected employee names and contact information 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"). CL&P articulated the increased security risks triggered by making employee contact information publicly available. See Docket No. 24-01-03, Motion No. 28 Ruling, at 2. PURA found that the Eversource email addresses, phone numbers, and non-public addresses of certain Eversource employees were exempt from public disclosure as information that constitutes commercial or financial information given in confidence and not required by statute. See id.; Conn. Gen. Stat. § 1-210(b)(5)(B). PURA has also previously protected employee contact information 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).

20. 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 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).

Negotiated Settlements

21. OCC-308, Attachment 1 CONFIDENTIAL, provides information relating to settlements negotiated by the Company. This information was negotiated with adverse parties to reach resolutions of contested claims. The information contained in OCC-308, Attachment 1 CONFIDENTIAL, includes settlement amounts, which are and will continue to be maintained as confidential by the parties and will not be disclosed other than to legal counsel and in other limited circumstances. Public disclosure of this material would reveal legal and financial information that

would disadvantage and cause harm to the Company in negotiating future settlements on reasonable terms. Any public disclosure of such information would be detrimental to the business interests of the Company in its service to customers.

22. It is well-established in Connecticut that, in order to promote the important public policy of encouraging parties to enter into settlement discussions and to reach settlements, courts will honor the parties' intent to protect the confidentiality of their settlement negotiations. See, e.g., Etter v. Advest, Inc., 2002 Conn. Super. LEXIS 3478 at *6 (Conn. Super. Ct. Oct. 29, 2002) (stating that there is a "privilege afforded confidential settlement communications with third parties…"); Tomasso Bros. v. Oct. Twenty-Four, Inc., 221 Conn. 194, 198, 602 A.2d 1011, 1014 (1992) ("The general rule that evidence of settlement negotiations is not admissible at trial is based upon the public policy of promoting the settlement of disputes."); Glastonbury Bank & Tr. Co. v. Corbett Constr. Co., Docket No. 521355, 1992 WL 316472, at *2 (Conn. Super. Ct. Oct. 15, 1992) (granting motion to strike special defense that deals with settlement negotiations between the parties because they are confidential and inadmissible in Connecticut); Lanier v. Hochman, 1998 Conn. Super. LEXIS 1755 at *30 fn. 3 (Conn. Super. Ct. June 19, 1998) (stating that "[t]he settlement amount, by agreement of the plaintiff and settling defendant, and approved by the court, was confidential.").

23. Section 16-1-38(a) of the Regulations of Connecticut State Agencies states that where, as here, PURA rules on an evidentiary issue, it "shall give effect to the rules of privilege recognized by law in Connecticut." As indicated above, there appears to be a public policy of encouraging parties to enter into settlement discussions and to reach settlements, where courts have honored the parties' intent to protect the confidentiality of their settlement negotiations. See Tomasso Bros., 221 Conn. at 198.

24. Granting protected status to the settlement discussions involving litigation or potential litigation is also consistent with PURA precedent. For example, in Docket No. 07-07-01, PURA granted a request to protect from public disclosure a confidential settlement of litigation with another party. See Docket No. 07-07-01, Application of The Connecticut Light and Power Company To Amend Rate Schedules, January 8, 2008 Letter Order Granting Motion No. 37 at Page 1.[3] More recently, in Docket No. 16-03-08RE01, PURA granted a request to protect from public disclosure a settlement of litigation with four other parties. See Docket No. 16-03-08RE01, Petition of Windham Solar LLC for Approval of a Power Purchase Agreement Between Windham Solar LLC and The Connecticut Light and Power Company d/b/a Eversource Energy – Voluntary Remand, June 11, 2020 Ruling on Motion No. 10 at 1;[4] see also Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Jan. 23, 2025 Ruling to Motion No. 25) (granting protective treatment to a confidential settlement amount); Docket No. 16-06-04, Application of The United Illuminating Company to Increase Rates and Charges (Sept. 1, 2016 Ruling on Motion No. 21) (protecting as confidential negotiated settlement agreement amounts and information); Docket No. 09-12-05, Application of The Connecticut Light and Power Company To Amend Its Rate Schedules (Apr. 1, 2010 Ruling on Motion No. 40; Feb.

[3] Page 1 of the January 8, 2008 letter order approving Motion No. 37 in Docket No. 07-07-01 states, in relevant part: "The Department of Public Utility Control (Department) is in receipt of the January 8, 2008 Motion of The Connecticut Light and Power Company (CL&P) to Amend the Protective Order in this docket. The Motion to Amend is to protect from public disclosure a confidential Settlement Agreement between CL&P and NRG concerning NRG's station service receivable and discussion as to how it would affect the amount of rate relief requested in this proceeding. The Department hereby grants the Motion."

[4] "The Public Utilities Regulatory Authority (Authority) acknowledges receipt of a motion for protection filed by The Connecticut Light and Power Company d/b/a Eversource Energy (Company), dated June 5, 2020. In that motion, the Company requests protected treatment for the confidential litigation settlement summary in Exhibit 1 to the June 5, 2020 Joint Motion to Approve the Litigation Settlement filed in the above-captioned docket. The Authority hereby grants the Company's motion. Said materials shall be maintained in a locked file available for viewing only by members of the Authority's staff and Commissioners."

20, 2010 Ruling on Motion No. 20) (protecting settlement agreements between Department of Revenue Services and utility).

Consultant Workpapers

25. OCC-365, Attachments 14, 15, 16, 18, 19, 24, and 33 CONFIDENTIAL provide workpaper documents and subscription materials of the Company's consultants. Some of the workpapers include proprietary reports which were received through paid subscriptions by the Company's consultants. Specifically, OCC-365, Attachments 14, 15, 16, 18, 19, and 24 CONFIDENTIAL, contain either entirely confidential, third-party reports or data sets provided to the Company's consultants through subscription-based data services and platforms, which allow subscribing customers access to various proprietary documents and information, in exchange for a subscription fee. The Company's consultants have subscriptions to receive these reports and data sets.

26. As part of the subscriptions, it is required that the recipients maintain as confidential and proprietary all data, materials, and publications received from the subscriptions and not to release publicly the databases or publications or any of the material contained in them. Subscription vendors operate under a business model to provide data access and publications to persons that purchase subscriptions for a fee. This subscription business model is based on the expectation that only paying subscribers will have access to the databases and publications. If the data and reports in OCC-365, Attachments 14, 15, 16, 18, 19, and 24 CONFIDENTIAL, were disclosed to the general public, it would violate the terms of the Company's consultants' subscriptions and harm the vendor's business interests because individuals and entities that seek access to this information would be able to access it without having to pay for a subscription. This would harm the Company, and its consultants, because it could limit future access to the

subscription databases and financial publications due to potential competitive disadvantages that could arise, which would deprive the Company of information vital to conducting its business. Therefore, the Company is submitting these documents as confidential only.

27. OCC-365, Attachments 18, 19, and 24 CONFIDENTIAL are consultant workpapers that have been created, developed, and are maintained by Ms. Bulkley. The workpapers were created utilizing her proprietary knowledge and are protected as her intellectual property. Ms. Bulkley's know-how to perform studies is highly proprietary and confidential and her workpapers have substantial commercial value and are proprietary to her consulting services. The commercial value of these workpapers would be substantially reduced if they were made publicly available to any parties including other consultants who compete with her to provide similar consulting services. For this reason, Ms. Bulkley does not disclose the workpapers publicly.

28. Further, OCC-365, Attachments 33 CONFIDENTIAL are workpapers that were created, developed, and are maintained by Ms. Nieto. The workpapers were created utilizing her proprietary knowledge and are protected as her intellectual property. Ms. Nieto informed CL&P that her know-how to perform the studies is highly proprietary and confidential and that her models and workpapers have substantial commercial value and are proprietary to their consulting services. The commercial value of these models and workpapers would be substantially reduced if they were made publicly available to any parties including other consultants who compete with her to provide similar consulting services. For this reason, Ms. Nieto does not disclose the models and workpapers publicly and she requires that CL&P provide the Excel workpapers as confidential-only exhibits.

29. PURA has previously protected from public disclosure proprietary and confidential databases and data developed and maintained by third-party vendors with the expectation that only paying subscribers and customers would have access to that information, in recognition of the data's substantial commercial value. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (March 5, 2025 Ruling to Motion No. 51) (granting confidential treatment to investor analyst reports filed in confidential only version); Docket No. 17-12-03RE11, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – New Rate Designs and Rates Review (March 11, 2021 Ruling on Motion No. 12) (approving confidential treatment for non-public subscription-based data); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend its Rate Schedules (July 22, 2014 Letter Order granting Motion No. 25) (protecting from public disclosure survey data from a third-party vendor whose business plan is to provide access to the data only to paying subscribers); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend its Rate Schedules (September 19, 2014 Letter Order granting Motion No. 43) (protecting from public disclosure information provided in response to Q-LF-12 from a third-party vendor's confidential database).

30. PURA has also previously protected from public disclosure the proprietary and confidential models and formulae developed by third party consultants. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend Its Rate Schedules, (December 18, 2024 Ruling to Motion No. 5) (protecting LEI's similar models filed in CL&P's affiliate's recent rate case); Docket No. 23-08-32, Application of the Connecticut Water Company to Amend Its Rate Schedule (November 16, 2023 Ruling on Motion No. 11) (protecting as confidential cost of service study model and formulae provided by third party consultant);

Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Oct. 18, 2022 Ruling on Motion No. 18) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 22-07-01, Application of Aquarion Water Company of Connecticut to Amend its Rate Schedules (Sept. 9, 2022 Ruling on Motion No. 7) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 18-08-14RE01, PURA Review of the Combined Heat and Power Project Solicitation Pursuant to Conn. Gen. Stat. § 16-258e (September 20, 2022 Ruling to Motion No. 2) (protecting the excel spreadsheets containing model formula and inputs developed by a third party consultant) (see also August 10, 2022 Ruling to Motion No. 29 in the originating docket, Docket No. 18-08-14); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend Rate Schedules (Sept. 19, 2014, Ruling on Motion No. 43) (protecting third-party consulting firm's confidential and proprietary database of industry statistics developed and maintained by the consulting firm).

31. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A), OCC-365, Attachments 14, 15, 16, 18, 19, 24, and 33 CONFIDENTIAL, qualify as "trade secrets" for purposes of the Freedom of Information Act. 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).

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

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

34. 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 CEII, confidential commercial and financial information, confidential legal settlement information, internal audit reports, employee names and email addresses, and consultant proprietary and subscription information.

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

36. 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.

37. 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 September 4, 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