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 8, 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 an interrogatory issued by the Office of Consumer Counsel (the "OCC") on September 22, 2026 ("OCC Set 21") contains Critical Energy Infrastructure Information ("CEII"), 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 an interrogatory in OCC Set 21:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
OCC-861	Attachment 1 CONFIDENTIAL Through Attachment 6 CONFIDENTIAL**	N/A – Filed as Confidential only*	October 7, 2026

* The attachments to OCC-861 are being provided as confidential-only.

**OCC-861, Attachment 2 CONFIDENTIAL through Attachment 5 CONFIDENTIAL are provided in parts A, B, and C due to file size.

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on October 7, 2026. The last item responsive to OCC Set 21 was filed with PURA on October 7, 2026.

CEII

2. Pursuant to Item 6(d) of PURA's Revised Procedural Order and Conn. Gen. Stat. § 1-210(b)(19), the Confidential Information contains CEII of the Company's electric distribution system.[1] Section 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[.]" Section 1-210(b)(19) defines "government-owned or leased institution or facility" as including a "facility owned or leased by a public service company, as defined in section 16-1[.]"

3. The Confidential Information provided in the confidential attachments includes load data for the past three years for the Company's feeders and substations. The Confidential Information is not only CEII, but is also data that the Company uses to determine what is or is not CEII. If disclosed, this information would create a system security risk and provide bad actors with detailed information relating to the Company's infrastructure and jeopardize operation of the Company's systems. Public disclosure of this highly sensitive information could allow a bad actor to identify system vulnerabilities the Company has not yet identified.

[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."

4. The Confidential Information is exempt from disclosure pursuant to 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]

5. PURA has granted similar requests to maintain information such as the CEII contained in the Confidential 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, (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 CEII); 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 CEII).

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

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

[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. Additionally, pursuant to the Revised Procedural Order, the Confidential Information is the type of information that is typically subject to protected treatment, specifically CEII.

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

10. 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.

11. 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 8, 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