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 16, 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 31, 2026 ("OCC Set 11") contains proprietary consultant materials, employee names, and confidential presentations to ratings agencies, 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 11:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
OCC-499	Attachment 2 CONFIDENTIAL	September 14, 2026	September 14, 2026
OCC-500	Attachment 1 CONFIDENTIAL	September 14, 2026	September 14, 2026
OCC-507	Attachment 43 CONFIDENTIAL through Attachment 61 CONFIDENTIAL	N/A – Filed as Confidential only	September 14, 2026
OCC-511	Attachment 1 CONFIDENTIAL through Attachment 5 CONFIDENTIAL*	N/A – Filed as Confidential only	September 14, 2026
OCC-512	Attachment 2 CONFIDENTIAL Attachment 3 CONFIDENTIAL**	September 14, 2026	September 14, 2026

* OCC-511, Attachment 4, CONFIDENTIAL, is provided in two parts (4_1 and 4_2) due to file size.

** The confidential attachments to OCC-512 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 September 14, 2026. The last item responsive to OCC Set 11 was filed with PURA on September 14, 2026.

Employee Names

2. OCC-499, Attachment 2 CONFIDENTIAL, and OCC-500, Attachment 1 CONFIDENTIAL contain names of 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 also 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).

3. 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 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).

Consultant Materials

4. OCC-507, Attachment 43 CONFIDENTIAL through Attachment 61 CONFIDENTIAL, and OCC-511, Attachment 1 CONFIDENTIAL through Attachment 5 CONFIDENTIAL, provide proprietary reports which were received through paid subscriptions by the Company's consultants. Specifically, OCC-507, Attachment 43 CONFIDENTIAL through

Attachment 61 CONFIDENTIAL, and OCC-511, Attachment 1 CONFIDENTIAL through Attachment 5 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.

5. 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-507, Attachment 43 CONFIDENTIAL through Attachment 61 CONFIDENTIAL, and OCC-511, Attachment 1 CONFIDENTIAL through Attachment 5 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.

6. 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).

7. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A), OCC-507, Attachment 43 CONFIDENTIAL through Attachment 61 CONFIDENTIAL, and OCC-511, Attachment 1 CONFIDENTIAL through Attachment 5 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).

Presentations for Rating Agencies

8. OCC-512, Attachments 2 and 3 CONFIDENTIAL, include copies of presentations made privately to credit ratings agencies. The presentations contain commercially sensitive and forward-looking financial information and non-public financial projections, the disclosure of which would harm the Company and provide non-public financial information and projections to the public at large. Public disclosure of this material would reveal strategic and competitive information that would be prejudicial and cause harm to CL&P and Eversource Energy. Any public disclosure of such information would be detrimental to the business interests of CL&P and Eversource Energy in their service to customers, and would allow unfair access to material, confidential, non-public financial information and forward-looking financial information. This financial data and forward-looking financial projections, non-public financial projections, and the basis for these data and projections, are considered proprietary, commercially sensitive, and strategic non-public business information. In addition, such material could be misused or improperly relied upon by persons making investment decisions, thereby exposing CL&P and Eversource Energy to potential claims and litigation if forward-looking financial projections intended for private use differ from actual financial performance. Please note that the Company has also redacted the confidential and public versions of this document for relevance where the presentation discusses other operating companies.

9. PURA has granted similar requests to maintain the ratings agency presentations similar to OCC-512, Attachments 2 and 3 CONFIDENTIAL, 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. 20, 2025 Ruling on Motion No. 41) (protecting similar non-public ratings agency presentations); Docket No. 16-06-04, Application of The United Illuminating Company to Increase Its Rates and Charges (Aug. 17, 2016 Ruling on Motion No. 13) (protecting non-public ratings agencies presentations); 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 Ruling on Motion No. 13) (protecting 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 Ruling on Motion No. 16) (protecting financial information presented to credit rating agencies).

10. The Company is providing OCC-512, Attachments 2 and 3 CONFIDENTIAL, as confidential-only documents, 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.

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

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

13. 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 employee names, and consultant proprietary and subscription information.

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

15. 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.

16. 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 16, 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