**STATE OF CONNECTICUT**

**PUBLIC UTILITIES REGULATORY AUTHORITY**

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| **APPLICATION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY TO AMEND ITS RATE SCHEDULES** | : | **DOCKET NO. 26-05-10** |
| | | **OCTOBER 19, 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") submits this motion to the Public Utilities Regulatory Authority ("PURA") to request that PURA grant protective treatment as described in this motion to ensure that confidential information provided by CL&P in the above-referenced proceeding is not subject to public disclosure. As outlined below, the Company submitted documentation on October 19, 2026, as a supplement in support of its rate case application that contains confidential, proprietary and/or competitive information related to individual employee information, customer information, and critical energy infrastructure information ("CEII"), which the Company does not disclose publicly (the "Confidential Information").

In support of this motion, the Company states as follows:

The confidential information addressed in this motion includes certain information to be provided in the following supplemental exhibit to the Company's initial filing:

| Exhibit | Content | Date Redacted Version Filed | Date Confidential Version Submitted |
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| CLP-ADDITIONS-6 Second Supplemental | Capital Project Documentation | Anticipated November 9, 2026 | October 19, 2026 |

**Confidential Information – Capital Additions Documentation**

1. Exhibit CLP-ADDITIONS-6 Second Supplemental contains specific customer identifying information. The Company does not disclose customer information, including customer names, account numbers, or financial information of customers, to the public. Public disclosure of the Company's customer information would harm its customers' privacy interests. Further, a PURA regulation prohibits gas companies from disclosing "customer lists or other specific customer information" without the prior informed consent of the customer. Conn. Agencies Regs. § 16-47a-3.

2. PURA has previously protected from public disclosure account-specific information of utility customers, including the customer specific information included on customer bills and in call recordings between customers and the Company. See, e.g., Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas Company to Amend their Rate Schedules (Dec. 6, 2023 Ruling on Motion No. 23) (protecting from public disclosure customer call recordings); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Oct. 6, 2022 Ruling on Motion No. 8) (protecting as confidential customer account specific information); Docket No. 20-08-03, PURA Investigation into Electric Distribution Companies' Preparation and Response to Tropical Strom Isaias (Dec. 7, 2020 Ruling on Motion No. 32) (protecting as confidential customer-specific information), (Dec. 8, 2020 Ruling on Motion No. 36) (protecting as confidential customer-

specific information); Docket No. 17-05-42, Application of The Southern Connecticut Gas Company to Increase its Rates and Charges (Aug. 23, 2017 Ruling on Motion No. 9) (protecting as confidential customer and confidential contact information); Docket No. 11-02-01, Semi-Annual Reconciliation of The Connecticut Light and Power Company's and The United Illuminating Company's Federally Mandated Congestion Costs and Generation Services Charge, April 11, 2011 DPUC Letter Order Approving Motion No. 6 (protecting from public disclosure customer names, account numbers, usage data and billing detail in Q-EL-12).

3. Exhibit CLP-ADDITIONS-6 Second Supplemental contains names and contact information for individual Eversource employees. The Company attempts to prevent public disclosure of this information due to security and financial risks in having this contact information publicly known, especially as may be related to computer security, phishing, social engineering, and other targeted scams and malfeasance involving fraudulent activities and communications.

4. PURA has previously protected employee names, employee signatures, and employee contact information as confidential. In Docket No. 24-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company, PURA approved The Connecticut Light and Power Company d/b/a Eversource Energy's ("CL&P") 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. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend Its Rate Schedules, (May 16, 2025 Ruling to Motion No. 72) (protecting as confidential employee and vendor 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).

5. Exhibit CLP-ADDITIONS-6 Second Supplemental also contains specific condition assessments and siting of the Company's electric distribution system and other facilities. The information provided in these exhibits includes photographs, diagrams, surveys, and other information evaluating the condition and risks present at these locations. 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 system.

6. The Company's Exhibit CLP-ADDITIONS-6 Second Supplemental therefore includes critical energy infrastructure information ("CEII") that is "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; and (iv) does not simply give the general location of the critical infrastructure." 18 C.F.R. § 388.113.

7. The Confidential Information included in Exhibit CLP-ADDITIONS-6 Second Supplemental 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.[1]

8. PURA has granted similar requests to maintain information such as the CEII contained in Exhibit CLP-ADDITIONS-6 Second Supplemental 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).

[1] 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.

**Request for Relief**

9. Overall, Exhibit CLP-ADDITIONS-6 Second Supplemental is excepted from public disclosure pursuant to Conn. Gen. Stat. §1-210(a) or exempt from disclosure under Conn. Gen. Stat. §1-210(b). Information protected by federal and state laws and regulations such as CEII and customer information is excepted from FOIA pursuant to Conn. Gen. Stat. §1-210(a). Section 1-210(b)(2) exempts files "the disclosure of which would constitute an invasion of personal privacy." Information where disclosure may result in a safety risk or a security risk to information technology systems are exempt from public disclosure under Conn. Gen. Stat. §§ 1-210(b)(19) and (20), respectively.

10. Further, pursuant to Items 6(a), 6(d), and 6(f) of PURA's Revised Procedural Order Regarding Protected Materials, dated September 17, 2026, customer information, critical energy infrastructure information, and employee contact information may be redacted.

11. CL&P has good cause to request that the Confidential Exhibits be afforded protective treatment by PURA and remain protected from public disclosure. CL&P maintains individual employee contact information, customer information, and critical energy infrastructure information as contained in the Confidential Exhibits as confidential and does not disclose such information publicly.

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

13. 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.

14. 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 19, 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