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 15, 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 Education, Outreach, and Enforcement (the "EOE") on September 22, 2026 ("EOE Set 6") contain employee names, confidential Requests for Proposals ("RFPs"), and third-party pricing information and contract terms, 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 EOE Set 6:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
EOE-271	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-273	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-277	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-280	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-286	Attachment 1 CONFIDENTIAL through Attachment 6 CONFIDENTIAL	October 14, 2026	October 14, 2026
EOE-290	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-291	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-292	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-294	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-295	Attachment 1 CONFIDENTIAL	October 11, 2026	October 11, 2026
EOE-300	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-301	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-302	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-304	Attachment 1 CONFIDENTIAL through Attachment 4 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-313	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-314	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-316	Attachment 1 CONFIDENTIAL	October 7, 2026	October 7, 2026
EOE-317	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-321	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-326	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-327	Attachment 1 CONFIDENTIAL	October 6, 2026	October 6, 2026

EOE-328	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 6, 2026	October 6, 2026
EOE-329	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	October 6, 2026	October 6, 2026

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on October 6, 2026; October 7, 2026; October 11, 2026, and October 14, 2026. The last item responsive to EOE Set 6 was filed with PURA on October 14, 2026.

Third-party Pricing Information and Contract Terms

2. EOE-271, Attachment 1 CONFIDENTIAL; EOE-273, Attachment 1 CONFIDENTIAL; EOE-280, Attachment 1 CONFIDENTIAL; EOE-290, Attachments 1 and 2 CONFIDENTIAL; EOE-290, Attachments 1 and 2 CONFIDENTIAL; EOE-291, Attachments 1 and 2 CONFIDENTIAL; EOE-292, Attachment 1 CONFIDENTIAL; EOE-295, Attachment 1 CONFIDENTIAL; EOE-300, Attachment 1 CONFIDENTIAL; EOE-301, Attachment 1 CONFIDENTIAL; EOE-302, Attachment 1 CONFIDENTIAL; EOE-304, Attachments 1 through 4 CONFIDENTIAL; EOE-313, Attachment 1 CONFIDENTIAL; EOE-314, Attachment 1 CONFIDENTIAL; EOE-316, Attachment 1 CONFIDENTIAL; EOE-317, Attachment 1 CONFIDENTIAL; EOE-321, Attachment 1 CONFIDENTIAL; EOE-326, Attachment 2 CONFIDENTIAL; EOE-328, Attachment 2 CONFIDENTIAL; and EOE-329, Attachment 2 CONFIDENTIAL, contain confidential vendor pricing and contract term information relating to the Company's third-party vendors. Specifically, these attachments contain vendor-specific invoices, contracts, pricing schedules, and pricing spreadsheets. The pricing and negotiated terms from third parties and consultants are confidential and proprietary, and public disclosure of this information 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 vendors. 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.

3. Pursuant to Item 6(b) of PURA's Revised Procedural Order Regarding Protected Materials, dated September 17, 2026 ("Revised Procedural Order") and Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in response to EOE-271, Attachment 1 CONFIDENTIAL; EOE-273, Attachment 1 CONFIDENTIAL; EOE-280, Attachment 1 CONFIDENTIAL; EOE-290, Attachments 1 and 2 CONFIDENTIAL; EOE-290, Attachments 1 and 2 CONFIDENTIAL; EOE-291, Attachments 1 and 2 CONFIDENTIAL; EOE-292, Attachment 1 CONFIDENTIAL; EOE-295, Attachment 1 CONFIDENTIAL; EOE-300, Attachment 1 CONFIDENTIAL; EOE-301, Attachment 1 CONFIDENTIAL; EOE-302, Attachment 1 CONFIDENTIAL; EOE-304, Attachments 1 through 4 CONFIDENTIAL; EOE-313, Attachment 1 CONFIDENTIAL; EOE-314, Attachment 1 CONFIDENTIAL; EOE-316, Attachment 1 CONFIDENTIAL; EOE-317, Attachment 1 CONFIDENTIAL; EOE-321, Attachment 1 CONFIDENTIAL; EOE-326, Attachment 2 CONFIDENTIAL; EOE-328, Attachment 2 CONFIDENTIAL; and EOE-329, Attachment 2 CONFIDENTIAL, qualify as "trade secrets" for purposes of the Freedom of Information Act ("FOIA"). 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).

4. PURA has approved requests to protect negotiated pricing and contract information as confidential. See, Docket No. 26-05-10 (Aug. 3, 2026 Ruling on Motion No. 10 at 4-5) (protecting as confidential negotiated contract terms, pricing, and unit cost information); (Sept. 24, 2026 Ruling on Motion No. 10 at 3-4) (protecting as confidential negotiated contract terms, pricing, and unit cost information); 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).

Confidential Requests for Proposals and Bids

5. EOE-294, Attachment 1 CONFIDENTIAL, contains specific term and condition information provided to Eversource for services to be rendered in response to the Company's RFP. The Confidential Information in EOE-294, Attachment 1 CONFIDENTIAL, includes information provided by the Company's outside vendors, which, if disclosed to the public and competitors would cause substantial harm to the Company and to its vendors. This information includes proprietary, competitive, and commercially sensitive information. EOE-294, Attachment 1 CONFIDENTIAL, also includes confidential terms and conditions that are not disclosed publicly. This information has been anonymized to protect the confidentiality of the vendor bids.

6. Pursuant to Item 6(b) of the Revised Procedural Order, and Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in EOE-294, Attachment 1 CONFIDENTIAL, qualifies as "trade secrets" for purposes of the Freedom of Information Act

("FOIA"). 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).

7. PURA has previously granted similar requests related to vendor bids and negotiated contract terms. 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 28, 2025 Ruling to Motion No. 98) (protecting pricing and contract information in RFPs as well as bid evaluations); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Jan. 12, 2023 Ruling on Motion No. 48) (protecting as confidential an electric distribution company's ("EDC") internal evaluations of vendor responses to RFPs); 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 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 information related to an EDC's 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) (relating to confidentiality for 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) (relating to confidentiality for 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) (relating to confidential vendor pricing information).

Employee Names

8. EOE-271, Attachment 1 CONFIDENTIAL; EOE-277, Attachment 1 CONFIDENTIAL; EOE-280, Attachment 1 CONFIDENTIAL; EOE-286, Attachments 1 CONFIDENTIAL through Attachment 6 CONFIDENTIAL; EOE-290, Attachments 1 and 2 CONFIDENTIAL; EOE-326, Attachments 1 and 2 CONFIDENTIAL; EOE-327, Attachment 1 CONFIDENTIAL; EOE-328, Attachments 1 and 2 CONFIDENTIAL; and EOE-329, Attachments 1 and 2 CONFIDENTIAL, contain names and contact information for individual Eversource employees. 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 Eversource 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.

9. This information is protected from public disclosure pursuant to Item 6(f) of PURA's Revised Procedural Order and 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). PURA has protected employee names and contact information from public disclosure in this docket. See, Docket No. 26-05-10, Aug. 3, 2026 Ruling on Motion No. 10 at 5-6.

10. PURA has previously protected employee names from public disclosure pursuant to Conn. Gen. Stat. § 1-210(b)(5)(B) ("Commercial or financial information given in confidence, not required by statute."). 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 of Eversource employee names and contact information pursuant to Section 1-210(b)(5)(B). See, Docket No. 24-01-03 (July 16, 2024 Ruling on Motion No. 28 at 2); see also 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 (Oct. 25, 2021 Ruling to Motion No. 7) (protecting employee names, addresses, and telephone numbers).

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 the FOIA exemptions in Conn. Gen. Stat. §1-210(b), as described herein.

13. Additionally, pursuant to the Revised Procedural Order, the Confidential Information is the type of information that is typically subject to protected treatment, including employee names, internal vendor bid evaluations, and third-party pricing information and contract terms.

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

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CERTIFICATION

I hereby certify that on October 15, 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