**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 6, 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 11, 2026 ("EOE Set 5") contain employee names, competitive bid assessments, 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 5:

| Interrogatory Number | Attachment Name | Redacted Filing Date | Confidential Filing Date |
|---|---|---|---|
| EOE-174 | Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL | N/A – Filed as Confidential only* | September 25, 2026 |
| EOE-182 | Attachment 1 CONFIDENTIAL | September 28, 2026 | September 28, 2026 |
| EOE-189 | Attachment 1 CONFIDENTIAL | September 25, 2026 | September 25, 2026 |
| EOE-205 | Attachment 2 CONFIDENTIAL | September 30, 2026 | September 30, 2026 |
| EOE-206 | Attachment 1 CONFIDENTIAL | September 29, 2026 | September 29, 2026 |
| EOE-209 | Attachment 1 CONFIDENTIAL | September 28, 2026 | September 28, 2026 |
| EOE-216 | Attachment 1 CONFIDENTIAL | October 2, 2026 | October 2, 2026 |
| EOE-218 | Attachment 1 CONFIDENTIAL | September 28, 2026 | September 28, 2026 |
| EOE-223 | Attachment 1 CONFIDENTIAL | October 2, 2026 | October 2, 2026 |
| EOE-225 | Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL | October 2, 2026 | October 2, 2026 |
| EOE-227 | Attachment 1 CONFIDENTIAL | October 2, 2026 | October 2, 2026 |
| EOE-228 | Attachment 1 CONFIDENTIAL | October 2, 2026 | October 2, 2026 |
| EOE-237 | Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL | September 29, 2026 | September 29, 2026 |
| EOE-244 | Attachment 1 CONFIDENTIAL | September 28, 2026 | September 28, 2026 |
| EOE-247 | Attachment 1 CONFIDENTIAL | September 29, 2026 | September 29, 2026 |
| EOE-249 | Attachment 1 CONFIDENTIAL | September 28, 2026 | September 28, 2026 |
| EOE-250 | Attachment 1 CONFIDENTIAL | September 28, 2026 | September 28, 2026 |
| EOE-255 | Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL | September 30, 2026 | September 30, 2026 |
| EOE-259 | Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL | September 29, 2026 | September 29, 2026 |
| EOE-260 | Attachment 3 CONFIDENTIAL through Attachment 5 CONFIDENTIAL | September 29, 2026 | September 29, 2026 |

| | | | |
|---|---|---|---|
| EOE-261 | Attachment 1 CONFIDENTIAL<br>Attachment 2 CONFIDENTIAL | September 29, 2026 | September 29, 2026 |
| EOE-262 | Attachment 1 CONFIDENTIAL<br>through<br>Attachment 3 CONFIDENTIAL | September 29, 2026 | September 29, 2026 |

***** The attachments to EOE-174 are being provided as confidential only for the time being, but the Company anticipates undertaking a redaction project to provide these attachments into the public record. Together, these attachments contain approximately 380 or more pages that must be manually redacted to provide a public-facing version.

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on September 25, 2026; September 28, 2026; September 29, 2026, September 30, 2026, and October 2, 2026. The last item responsive to EOE Set 5 was filed with PURA on October 2, 2026.

***Third-party Pricing Information and Contract Terms***

2. EOE-189, Attachment 1 CONFIDENTIAL; EOE-206, Attachment 1 CONFIDENTIAL; EOE-209, Attachment 1 CONFIDENTIAL; EOE-216, Attachment 1 CONFIDENTIAL; EOE-223, Attachment 1 CONFIDENTIAL; EOE-225, Attachments 1 and 2 CONFIDENTIAL; EOE-227, Attachment 1 CONFIDENTIAL; EOE-228, Attachment 1 CONFIDENTIAL; EOE-237, Attachment 2 CONFIDENTIAL; EOE-228, Attachment 1 CONFIDENTIAL; EOE-244, Attachment 1 CONFIDENTIAL; EOE-247, Attachment 1 CONFIDENTIAL; EOE-249, Attachment 1 CONFIDENTIAL; EOE-255, Attachments 1 and 2 CONFIDENTIAL; EOE-259, Attachment 3 CONFIDENTIAL; and EOE-262, Attachment 3 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 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 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. EOE-174, Attachments 1 through 3 CONFIDENTIAL, contain confidential vendor pricing and contract term information relating to the Company's Master Service Agreements ("MSA") with third-party vendors. EOE-174, Attachment 1 CONFIDENTIAL, shows the redlines/revisions made to the MSA template from 2017-2022, effective August 18, 2022. EOE-174, Attachment 2 CONFIDENTIAL, shows the redlines/revisions made to the MSA template from 2022-2024, effective November 22, 2024. EOE-174, Attachment 3 CONFIDENTIAL, contains the revisions made to the Exhibit B Pricing Schedules between 2017 and 2022, as well as 2022 and 2024. The Company has used the redlines and revisions to the MSA templates to negotiate pricing and other contract terms with third parties and consultants, which 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. Public disclosure of this information would cause substantial harm to the Company and its vendors. Negotiated contract terms, pricing, and unit cost terms are provided with an expectation of privacy and must be protected from public disclosure to ensure competitive market pricing.

4. 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-174, Attachments 1 through 3 CONFIDENTIAL; EOE-189, Attachment 1 CONFIDENTIAL; EOE-206, Attachment 1 CONFIDENTIAL; EOE-209, Attachment 1 CONFIDENTIAL; EOE-216, Attachment 1 CONFIDENTIAL; EOE-223, Attachment 1 CONFIDENTIAL; EOE-225, Attachments 1 and 2 CONFIDENTIAL; EOE-227, Attachment 1 CONFIDENTIAL; EOE-228, Attachment 1 CONFIDENTIAL; EOE-237, Attachment 2 CONFIDENTIAL; EOE-228, Attachment 1 CONFIDENTIAL; EOE-244, Attachment 1 CONFIDENTIAL; EOE-247, Attachment 1 CONFIDENTIAL; EOE-249, Attachment 1 CONFIDENTIAL; EOE-255, Attachments 1 and 2 CONFIDENTIAL; EOE-259, Attachment 3 CONFIDENTIAL; and EOE-262, Attachment 3 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).

5. The redacted commercial contract terms in the above-described confidential attachments qualify for protective treatment pursuant to Item 6(b) of PURA's Revised Procedural Order, which provides that parties and intervenors may redact the following information:

> Contract terms whose disclosure would negatively impact the filer's business position or the business position of an entity with which it has a contractual relationship (e.g., **special negotiated contract terms including pricing, unit cost information, and commercial terms**);

(Emphasis added.) Specifically, the redlined revisions to the MSA template in EOE-174, Attachments 1 through 3, are special negotiated contract terms including pricing, unit cost information, and commercial terms that would negatively impact the Company's business position vis-à-vis the vendor community, including existing and prospective vendors, if publicly disclosed.

6. The contractual term revisions to the MSAs in EOE-174, Attachments 1 through 3 CONFIDENTIAL, derive independent economic value from not being known because they form the basis of negotiated commercial terms with existing and prospective vendors. The Company does not publicly disclose the negotiated commercial terms in the MSA revisions in EOE-174, Attachments 1 through 3 CONFIDENTIAL. The redacted Confidential Information is narrowly limited to material redlined contract revisions, and does not include formatting changes, stylistic edits, clerical corrections, or other non-substantive revisions to the MSAs. Public disclosure of the material revisions could provide current and prospective vendors insight into specific terms the Company has accepted, rejected, modified during negotiations or modified after framework agreements have expired. Examples of such terms include provisions addressing risk allocation, indemnification, insurance requirements, service obligations, change order process requirements, and other negotiated business terms. Disclosure of revisions to these MSA provisions over time could reveal the Company's evolving contractual positions, negotiation strategies, and commercial priorities, providing vendors with insight that could be used to their advantage in future negotiations.

7. PURA has regulatory 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 Bid Evaluations***

8. EOE-182, Attachment 1 CONFIDENTIAL, provides evaluation of vendor bids. Specifically, this attachment includes competitive bid results associated with the 2024–2026 Emergency Response Plan ("ERP") Wires Down Guard Request for Proposal ("RFP"), which includes the competitive bid assessment applicable to vendors performing wire guard services during 2024–2025. EOE-182, Attachment 1 CONFIDENTIAL, shows the Company's evaluation of the vendor bids, including the Company's internal technical and commercial scores for each bidder. The Company's internal RFP evaluation process is confidential and, if disclosed, may impact the Company's ability to secure services from competent vendors at competitive rates, which in turn would impact customers. Potential bidders should not have access to the Companies' breakdown of scoring, because such access would provide them an advantage in the evaluation process, potentially skewing the results and content of proposals. In maintaining its evaluation criteria as confidential, the Company is assured that potential bidder proposals are based on the market and the bidder's qualifications.

9. The Confidential Information related to the evaluation of vendor bids in EOE-182, Attachment 1 CONFIDENTIAL has been redacted pursuant to Item 6(h) of the Revised Procedural Order, which permits the Company to redact "[i]internal bid evaluation processes and procedures[.]"

10. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in EOE-182, Attachment 1 CONFIDENTIAL, qualifies as "trade secrets" for purposes

of 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).

11. PURA has previously granted similar requests related to bid evaluations. 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 a Company's 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 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).

***Employee Names***

12. EOE-205, Attachment 2 CONFIDENTIAL; EOE-218, Attachment 1 CONFIDENTIAL; EOE-237, Attachment 2 CONFIDENTIAL; EOE-250, Attachment 1 CONFIDENTIAL; EOE-255, Attachments 1 and 2 CONFIDENTIAL; EOE-259, Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL; EOE-261, Attachments 1 and 2 CONFIDENTIAL; and EOE-261, Attachment 1 CONFIDENTIAL through Attachment 3 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.

13. 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.

14. 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). 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).

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

16. The Confidential Information is exempt from disclosure under the FOIA exemptions in Conn. Gen. Stat. §1-210(b), as described herein.

17. 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.

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

19. 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.

20. 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 October 6, 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