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 10, 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 ("OCC") on August 17, 2026 ("OCC Set 7"), contains confidential Request for Proposals ("RFPs"), bid evaluations, employee names, and proprietary working models, 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 7:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
OCC-397	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	N/A – Filed as Confidential only	September 8, 2026*
OCC-401	Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL	September 2, 2026	September 2, 2026
OCC-408	Attachment 1 CONFIDENTIAL	August 31, 2026	August 31, 2026

*The Excel files for OCC-397, Attachments 1 and 2 CONFIDENTIAL were filed on September 8, 2026. The Company followed up with PDF versions on September 9, 2026.

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on August 31, 2026, September 2, 2026, and September 8, 2026. The last response to OCC Set 8 was filed with PURA on September 8, 2026.

Confidential Consultant Models

2. OCC-397, Attachments 1 and 2 CONFIDENTIAL, are West Monroe Partners, LLC's (West Monroe) working models. These models were created, developed, and are maintained by West Monroe. The models were created utilizing proprietary knowledge and are protected as intellectual property. West Monroe informed CL&P that the information within OCC-397, Attachments 1 and 2 CONFIDENTIAL, including the formulas, methods, and techniques, is proprietary information that competitors to West Monroe would find highly financially valuable and could result in significant financial hardships for West Monroe if disclosed. Further, the data analysis and formulaic computations contained within OCC-397, Attachments 1 and 2 CONFIDENTIAL, are proprietary to West Monroe and are not known outside of West Monroe. The commercial value of these models would be substantially reduced if they were made publicly available to any parties including other consultants who compete with West Monroe to provide

similar consulting services. For this reason, West Monroe does not disclose the models publicly, and requires that CL&P provide the Excel models as confidential-only exhibits. West Monroe has provided an affidavit to address its concerns relating to the confidentiality of its confidential model documents. See Attachment B.

3. PURA has previously protected from public disclosure the proprietary and confidential models and formulae developed by third party consultants. See, e.g., 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 LEI's similar models filed in CL&P's affiliate's recent rate case); Docket No. 23-08-32, Application of the Connecticut Water Company to Amend Its Rate Schedule (November 16, 2023 Ruling on Motion No. 11) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Oct. 18, 2022 Ruling on Motion No. 18) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 22-07-01, Application of Aquarion Water Company of Connecticut to Amend its Rate Schedules (Sept. 9, 2022 Ruling on Motion No. 7) (protecting as confidential cost of service study model and formulae provided by third party consultant); Docket No. 18-08-14RE01, PURA Review of the Combined Heat and Power Project Solicitation Pursuant to Conn. Gen. Stat. § 16-258e (September 20, 2022 Ruling to Motion No. 2) (protecting the excel spreadsheets containing model formula and inputs developed by a third party consultant) (see also August 10, 2022 Ruling to Motion No. 29 in the originating docket, Docket No. 18-08-14); Docket No. 14-05-06, Application of The Connecticut Light and Power Company to Amend Rate Schedules (Sept. 19, 2014, Ruling on Motion No. 43) (protecting

third-party consulting firm's confidential and proprietary database of industry statistics developed and maintained by the consulting firm).

Confidential Requests for Proposals and Bid Evaluations

4. OCC-401, Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL, contain specific pricing and term and condition information provided to Eversource for services to be rendered in response to a RFP, including specific service fees. The Confidential Information in OCC-401, Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL, includes cost information and competitive pricing information of the Company's outside vendors, which, if disclosed to the public and competitors would cause substantial harm to the Company and to their vendors. This pricing information includes proprietary, competitive and commercially sensitive information. OCC-401, Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL, also include confidential terms and conditions that are not disclosed publicly.

5. Additionally, OCC-401, Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL, provide evaluation of vendor bids provided in response to the RFP. These attachments include the Company's evaluation of the vendor bids, including the Company's internal technical analysis of each bidder and the quality of each bid submitted as well as internal classification of the bids. 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' evaluation criteria and processes, 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.

6. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in OCC-401, Attachment 1 CONFIDENTIAL through Attachment 3 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, pricing information, and negotiated contract terms, and 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 and Vendor Names

8. OCC-401, Attachment 1 CONFIDENTIAL through Attachment 3 CONFIDENTIAL, and OCC-408, Attachment 1 CONFIDENTIAL contain names of individual employees 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"). 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. 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).

9. 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).

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

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

12. 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 confidential commercial and financial information, internal bid evaluation processes and procedures, employee names, and consultant proprietary information.

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

14. 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. As noted previously, Attachment B, is the Affidavit of Timothy Valin, Senior Partner in the Energy and Utilities practice at West Monroe Partners, LLC, and he addresses the confidentiality of the West Monroe models discussed herein.

1. 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 September 10, 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