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**
		November 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 PURA on September 25, 2026 ("PURA Set 8") contain employee names, employee salary information, confidential consultant models, third-party pricing information and contract terms, and banking information, 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 in PURA Set 8:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
RRU-060	Attachment 1 CONFIDENTIAL	October 13, 2026	October 13, 2026
RSR-021	Attachment 1 CONFIDENTIAL Attachment 2 CONFIDENTIAL	N/A – Filed as Confidential Only*	October 21, 2026
UPA-055	Attachment 1 CONFIDENTIAL	October 30, 2026	October 30, 2026

*The attachments to RSR-021 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 documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on October 13, 2026; October 21, 2026; and October 30, 2026. The last response to PURA Set 8 was filed with PURA on November 5, 2026.

Employee Names and Contact Information

2. RSR-021, Attachments 1 and 2 CONFIDENTIAL; and RRU-060, Attachment 1 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.

3. This information is protected from public disclosure pursuant to Item 6(f) of PURA's Revised Procedural Order Regarding Protected Materials, dated September 17, 2026 ("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), and Docket No. 26-05-10 (Sept. 10, 2026 Ruling on Motion No. 32).

4. 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).

Salary Information

5. RRU-060, Attachment 1 CONFIDENTIAL, provides confidential salary information for certain employees within the Company. Specifically, RRU-060, Attachment 1 CONFIDENTIAL, provides the name, title, base salary allocated to CL&P, and percent allocated to CL&P. The disclosure of salary information and employee names would violate the privacy interests of the affected employees, both internally and to the general public. The Company takes great care not to disclose confidential salary information publicly or to other employees.

Accordingly, for purposes of this filing, the Company is providing RRU-060, Attachment 1 CONFIDENTIAL, with only the employee names and base salary allocated to CL&P redacted.[1]

6. Pursuant to Conn. Gen. Stat. § 1-210(b)(2), the Confidential Information in RRU-060, Attachment 1 CONFIDENTIAL, qualifies as "[p]ersonnel or medical files and similar files the disclosure of which would constitute an invasion of personal privacy" and is exempt from public disclosure.

7. To establish an exemption under Conn. Gen. Stat. § 1-210(b)(2), the proponent bears a two-part burden. First, the proponent must show that the records at issue fall within a protected category—personnel, medical, or "similar" files. A document or file is "similar" to a personnel file if it contains material that, under ordinary circumstances, would be pertinent to traditional personnel decisions. Connecticut Alcohol & Drug Abuse Comm'n v. Freedom of Info. Comm'n, 233 Conn. 28, 41 (1995). Second, the proponent must demonstrate that disclosure would constitute an invasion of personal privacy. Perkins v. Freedom of Information Commission, 228 Conn. 158, 168 (1993). The salary information for which the Company seeks protective treatment satisfies both requirements of Section 1-210(b)(2).

[1] The confidential treatment requested for RRU-060, Attachment 1 CONFIDENTIAL differs from the confidential treatment sought for ALLCO-022, Attachment 1 CONFIDENTIAL, in Motion No. 69 and the Company's Motion for Full Panel Review filed on October 20, 2026 (i.e., Motion No. 94). In ALLCO-022, Attachment 1 CONFIDENTIAL, the Company redacted the CL&P allocation percentage because, when combined with the disclosed allocated amounts for multiple compensation components—including base salary, total variable compensation, and indirect costs—it could be used to determine total unallocated compensation amounts. Given the Legal Department's small size, the CL&P allocation percentage would allow the public and internal Eversource employees to calculate sensitive employee compensation information for employees that are easily and readily identifiable. In contrast, in RRU-060, Attachment 1 CONFIDENTIAL, the Company has redacted employee names and allocated base salary amounts, but not the allocation percentage. Unlike ALLCO-022, Attachment 1 CONFIDENTIAL, RRU-060, Attachment 1 CONFIDENTIAL, contains only base salary information and does not include additional compensation components (i.e., total variable compensation and indirect costs). Thus, unlike ALLCO-022, Attachment 1 CONFIDENTIAL, the allocation percentage is not the key to reconstructing a broader compensation schedule for employees. The redactions in RRU-060, Attachment 1 CONFIDENTIAL, are specifically tailored to protect employee-identifying and individual base salary information.

8. The first requirement is satisfied because the base salary information is functionally similar to information contained in an employee's personnel file. Conn. Gen. Stat. § 1-210(b)(2) is not limited to documents formally maintained in a personnel file; rather, the inquiry turns on the nature and use of the information contained in the record. Connecticut Alcohol & Drug Abuse Comm'n v. Freedom of Info. Comm'n, 233 Conn. 28, 41–42 (1995). Because salary information directly relates to compensation decisions associated with personnel administration, the information falls within the statute's protection for personnel or "similar" files.

9. The second requirement is also satisfied. Under Perkins, disclosure constitutes an invasion of personal privacy when the information does not pertain to legitimate matters of public concern, and its disclosure would be highly offensive to a reasonable person. Perkins v. Freedom of Info. Comm'n, 228 Conn. 158, 175 (1993). The salary of a named employee who is not a public official does not serve a legitimate public interest. While the Connecticut public has a legitimate interest in CL&P's aggregate labor costs, this interest does not encompass the salaries of named employees. Public disclosure would also be highly offensive to a reasonable person because it would expose the employee's personal financial information to unrestricted scrutiny by the public and the employee's colleagues. Accordingly, protection of the salaries of named individuals satisfies both elements of the Perkins standard and would constitute an invasion of personal privacy under Section 1-210(b)(2).

10. In summary, the salary information satisfies both requirements for protection under Conn. Gen. Stat. § 1-210(b)(2). It is functionally equivalent to personnel-file information because it concerns individual employees' salaries, and its disclosure would invade personal privacy by revealing personal financial information without advancing a legitimate public concern.

11. The Company also has an independent statutory obligation to maintain individually identifiable employee information as confidential. Conn. Gen. Stat. § 31-128f (prohibiting disclosure of "individually identifiable information contained in the personnel file or medical records of any employee . . . to any person or entity not employed by or affiliated with the employer without the written authorization of such employee" except where required "to comply with federal, state or local laws or regulations" or for other limited exceptions).

12. In addition, pursuant to Conn. Gen. Stat. § 1-210(b)(5), the Confidential Information in RRU-060, Attachment 1 CONFIDENTIAL, qualifies as a trade secret, and is exempt from public disclosure.

13. Information qualifies as a trade secret if it (i) has actual or potential independent economic value because it is not generally known or readily ascertainable by proper means to those who could obtain economic value from its disclosure or use, and (ii) is the subject of reasonable efforts under the circumstances to maintain its secrecy. The salary information RRU-060, Attachment 1 CONFIDENTIAL, satisfies both elements: its confidentiality provides the Company with a competitive advantage in recruiting and retaining talent, and access is limited to employees whose roles require such information.

14. The first requirement is satisfied because confidentiality preserves the economic value of the Company's individual employee salary information. CL&P competes with other employers to attract and retain highly qualified personnel, including employees with specialized skills essential to regulated utility operations. Disclosure of salaries attributable to identifiable employees would give competitors direct insight into the Company's pay practices, enable them to identify and target employees with tailored offers, and thereby increase the Company's recruiting and retention costs. Because competitors could obtain economic value from using the

information in that manner, the information derives independent economic value from not being generally known or readily ascertainable.

15. Moreover, disclosure could reveal pay disparities among employees in the same or similar roles, provide competitors with valuable intelligence for their own recruiting and compensation strategies, and foster internal discord if employees perceive unjustified differences. The negative impact on morale and retention further underscores the economic and business value of keeping this information confidential.

16. The experience of other utility regulators demonstrates that these competitive and workplace concerns are real rather than hypothetical. In Fla. Power & Light Co. v. Fla. Pub. Serv. Comm'n, 31 So. 3d 860 (Fla. Dist. Ct. App. 2010), Progress Energy and Florida Power sought confidential treatment of employee compensation information, arguing that disclosure would invade employee privacy, risk the loss of key personnel, and produce internal discord. Id. at 862–63. The Florida First District Court of Appeal reversed the Public Service Commission's denial of confidentiality, finding that disclosure could weaken the utilities' competitive position and foster disputes among similarly situated employees receiving different compensation. Id. at 866. Although the decision was based on Florida law, the competitive and morale-based harms it recognized are instructive because they are the same harms that make the Company's salary information economically valuable when kept confidential.

17. The Company also satisfies the second requirement because it takes reasonable measures to preserve the secrecy of employee salary information. The salaries of named employees are not broadly disclosed within the organization. Instead, access is restricted to a limited group of Eversource employees whose responsibilities require them to make or administer

compensation decisions. Those access restrictions constitute reasonable efforts under the circumstances to maintain the information's secrecy.

18. PURA's Revised Procedural Order in this proceeding and its prior rulings provide additional support for that protection. The Revised Procedural Order identified categories of information eligible for protection in this proceeding, including personnel information whose disclosure would invade personal privacy. (Revised Procedural Order at 3, Item 6(f)). The individualized compensation information at issue here clearly fits within that category. This conclusion is further supported by PURA's prior rulings protecting employee information where the disclosure of such information would constitute an invasion of personal privacy. See, Docket No. 24-10-04, Application of The United Illuminating Company to Amend its Rate Schedules (Feb. 11, 2025 Ruling on Motion No. 20); (Apr. 9, 2025 Ruling on Motion No. 78). Further, PURA has previously protected from public disclosure the personal identifying information of utility employees. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend its Rate Schedules (Jul. 16, 2025 Ruling on Motion No. 120) (protecting as confidential employee compensation information and salary information); Docket No. 22-04-01, Application of Aquarion Company, Aquarion Merger Company II, LLC, and The Torrington Water Company for Approval of Change in Control (June 30, 2022 Ruling on Motion No. 2) (approving confidential treatment for specific salary information tied to non-officer level employees); Docket No. 21-04-23, Application of Aquarion Company, Aquarion Merger Company, LLC, Aquarion Water Company of Connecticut, New England Service Company and Valley Water Systems, Inc. for Approval of Change of Control and Plan of Merger (July 23, 2021 Ruling on Motion No. 3; Aug. 24, 2021 Ruling on Motion No. 5); Docket No. 20-08-03, PURA Investigation Into Electric Distribution Companies' Preparation and Response to Tropical Storm

Isaias (Dec. 7, 2020 Ruling on Motion No. 32); (protecting as confidential company employee personal contact information); (Dec. 10, 2020 Ruling on Motion No. 41) (protecting as confidential personal employee information).

Third-party Pricing Information and Contract Terms

19. RSR-021, Attachments 1 and 2 CONFIDENTIAL, contain confidential vendor pricing and contract term information relating to the Company's third-party vendors. 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. Additionally, the Confidential Information in RSR-021, Attachment 2 CONFIDENTIAL, includes confidential banking information of the vendor, which is not disclosed publicly and if disclosed could subject the Company, its vendor, and banking partners to potential fraud and abuse.

20. Pursuant to Item 6(b) of PURA's Revised Procedural Order, and Conn. Gen. Stat. § 1-210(b)(5)(A), the Confidential Information provided in response to RSR-021, Attachments 1 and 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).

21. 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).

22. Additionally, PURA has previously protected confidential banking information such as that contained in RSR-021, Attachment 2 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 (Dec. 18, 2024 Ruling on Motion No. 5) (protecting as confidential bank account numbers and tax identification numbers); Docket No. 18-03-38, PURA Investigation Into the Re-Financing Arrangements of Frontier Communications (June 25, 2019 Ruling on Motion No. 3) (approving protective treatment for non-public financial information); Docket No. 17-06-30, Joint Application of Eversource Energy and Macquarie Utilities Inc. for Approval of a Change of Control (Aug. 24, 2017 Ruling on Motion No. 6) (approving on reconsideration protective treatment for information relating to strategic business 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); 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. 14-01-46, Joint Application of Frontier Communications Corporation and AT&T Inc. for Approval of a Change of Control (Feb. 21, 2014 Ruling on Motion No. 1) (protecting sensitive and proprietary financial information).

Confidential Consultant Models

23. UPA-055, Attachment 1 CONFIDENTIAL, is a London Economics International ("LEI") working model. This model was created, developed, and is maintained by LEI. The model was created utilizing proprietary knowledge and is protected as intellectual property. LEI informed CL&P that the information within UPA-055, Attachment 1 CONFIDENTIAL, including the formulas, methods, and techniques, is proprietary information that competitors to LEI would find highly financially valuable and could result in significant financial hardships for LEI if disclosed. Further, the data analysis and formulaic computations contained within UPA-055, Attachment 1 CONFIDENTIAL, are proprietary to LEI and are not known outside of LEI. The commercial value of the model would be substantially reduced if it were made publicly available to any parties including other consultants who compete with LEI to provide similar consulting services.

24. This information is protected from public disclosure pursuant to Item 6(j) of PURA's Revised Procedural Order. 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).

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

26. The Confidential Information is exempt from disclosure under Conn. Gen. Stat. §1-210(b) and Conn. Gen. Stat. §§ 1-210(b)(2), (5)(A), (5)(B), (b)(19), and (b)(20), as described herein.

27. Additionally, pursuant to the Revised Procedural Order, the Confidential Information is the type of information that is typically subject to protected treatment, specifically employee names, negotiated contract terms, and confidential and proprietary formulae.

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

29. 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.

30. 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 November 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