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 14, 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 (the "OCC") on September 21, 2026 ("OCC Set 19") and on September 22, 2026 ("OCC Set 20") contain employee names, cybersecurity information, Critical Energy Infrastructure Information ("CEII"), 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 in OCC Set 19 and OCC Set 20:

Interrogatory Number	Attachment Name	Redacted Filing Date	Confidential Filing Date
OCC-753	Attachment 3 CONFIDENTIAL	October 5, 2026	October 5, 2026
OCC-767	Attachment 1 CONFIDENTIAL	October 5, 2026	October 5, 2026
OCC-780	Attachment 2 CONFIDENTIAL	October 5, 2026	October 5, 2026
OCC-792	Attachment 1 CONFIDENTIAL through Attachment 5 CONFIDENTIAL	October 5, 2026	October 5, 2026
OCC-813	Attachment 1 CONFIDENTIAL	October 5, 2026	October 5, 2026
OCC-823	Attachment 1 CONFIDENTIAL	October 6, 2026	October 7, 2026

Together, these documents are referred to herein as the "Confidential Information." The Confidential Information was submitted to PURA via email on October 5, 2026 and October 7, 2026. The last response to OCC Set 19 was filed with PURA on October 13, 2026, and the last response to OCC Set 20 was filed with PURA on October 14, 2026.

Employee Names

2. OCC-753, Attachment 3 CONFIDENTIAL, OCC-780, Attachment 2 CONFIDENTIAL, and OCC-823, 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 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.

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). 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).

Cybersecurity

5. OCC-767, Attachment 1 CONFIDENTIAL includes information on the Company's cybersecurity policies, including incident response procedures. OCC-767, Attachment 1 CONFIDENTIAL, contains commercially sensitive and non-public business information, including information describing the Company's specific cybersecurity measures that the Company does not disclose to the public. Disclosure of the Company's cybersecurity measures would reveal information about the Company's cybersecurity systems to the general public, which would provide bad actors with a means to potentially disrupt and impact the Company's systems

and the safe and reliable service throughout the state of Connecticut. In order to protect the Company's cybersecurity systems from such an event, OCC-767, Attachment 1 CONFIDENTIAL, should not be disclosed publicly.

6. OCC-767, Attachment 1 CONFIDENTIAL, is exempt from disclosure pursuant to Item 6(b) of PURA's Revised Procedural Order and Conn. Gen. Stat. § 1-210(b)(20). Conn. Gen. Stat. § 1-210(b)(20) exempts from public disclosure cybersecurity information because it constitutes "[r]ecords of standards, procedures, processes, software and codes, not otherwise available to the public, the disclosure of which would compromise the security or integrity of an information technology system."

7. PURA has granted protective treatment to cybersecurity policies similar to the cybersecurity policies provided in OCC-767, Attachment 1 CONFIDENTIAL, on the basis that the cybersecurity policies constitute sensitive cybersecurity information. In the Docket No. 26-04-06 Motion Nos. 2 & 3 Ruling on August 7, 2026, PURA stated:

> The Motion No. 3 Documents constitute Company security and IT policies . . . . the Authority finds these documents exempt from public disclosure under General Statutes § 1-210(b)(20) because these policies provide detail on the applications and configurations the Company takes to respond to cyberattacks, which could provide an advantage to attackers.

Docket No. 26-04-06, Investigation of Eversource Companies Data Breach of Customer Information (Aug. 7, 2026 Ruling on Motion Nos. 2 & 3 at 4); see also, Docket No 25-04-23, Petition of Office of Consumer Counsel for an Investigation of Avangrid Companies' Data Breach of Customer Information (June 2, 2025 Ruling on Motion No. 1) (protecting cybersecurity documents as confidential pursuant to Conn. Gen. Stat. §§ 1-210(b)(19) and (20)); Docket No. 23-11-02, Application of Connecticut Natural Gas Corporation and The Southern Connecticut Gas

Company to Amend their Rate Schedules (Apr. 11, 2024, Ruling on Motion No. 86) (protecting cybersecurity documents as confidential pursuant to Conn. Gen. Stat. §§ 1-210(b)(19) and (20)).

Third-party Pricing Information and Contract Terms

8. OCC-823, Attachment 1 CONFIDENTIAL, contains confidential negotiated insurance coverages, sub-limits, and retentions that are negotiated between the Company and its insurance contract counterparties. The pricing and negotiated terms from third parties are confidential and proprietary, and public disclosure of this data would adversely impact the third parties 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.

9. 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 OCC-823, Attachment 1 CONFIDENTIAL, qualifies as "trade secrets" for purposes of the Freedom of Information Act. 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).

10. PURA has previously approved requests to protect similar negotiated pricing and contract information as confidential. See, 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).

CEII

11. OCC-792, Attachment 1 CONFIDENTIAL through Attachment 5 CONFIDENTIAL, and OCC-813, Attachment 1 CONFIDENTIAL, contain CEII of the Company's electric distribution system[1] that is protected from public disclosure pursuant to Item 6(d) of PURA's Revised Procedural Order and Conn. Gen. Stat. § 1-210(b)(19). Section 1-210(b)(19) exempts from public disclosure "[r]ecords when there are reasonable grounds to believe disclosure may result in a safety risk, including the risk of harm to any person, any government owned or leased institution or facility or any fixture or appurtenance and equipment attached to, or contained in, such institution or facility[.]" Section 1-210(b)(19) defines "government-owned or leased institution or facility" as including a "facility owned or leased by a public service company, as defined in section 16-1[.]"

12. The Confidential Information provided in OCC-792, Attachment 1 CONFIDENTIAL through Attachment 5 CONFIDENTIAL, and OCC-813, Attachment 1 CONFIDENTIAL, includes circuit identifiers and descriptions, asset names, asset locations, and

[1] 18 C.F.R. § 388.113(c)(2) defines CEII: "Critical energy infrastructure information means 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, 5 U.S.C. § 552; and (iv) Does not simply give the general location of the critical infrastructure."

identified risks. 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 systems.

13. The Confidential Information 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.[2]

14. PURA has granted similar requests to maintain information such as the CEII contained in the Confidential Information as confidential. See 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 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 (Aug. 9, 2016 Order on Motion No. 10) (protecting as confidential CEII); 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 CEII).

[2] 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.

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 Conn. Gen. Stat. §1-210(a) and (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..

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

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CERTIFICATION

I hereby certify that on October 14, 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