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 8, 2026**

OBJECTION OF ALLCO FINANCE LIMITED TO THE COMPANY'S MOTION FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION (OCC SET 4, OCC SET 5, PURA SET 2)

Allco Finance Limited ("Allco"), an intervenor in this proceeding, respectfully objects in part to the September 4, 2026 Motion of The Connecticut Light and Power Company d/b/a Eversource Energy ("CL&P" or the "Company") for Protective Treatment of Confidential Information (the "Motion"). Allco does not oppose protective treatment for genuinely sensitive personal and financial data — customers' individually identifiable information, employee names and personal contact information, and vendor bank account numbers. But the Motion goes much further. It asks the Authority to bless the confidential-only submission of fifty-two internal audit reports with no public redacted version, in violation of the Authority's own Procedural Order; it discloses that the Company has unilaterally redacted those confidential-only documents "for relevance," so that not even the Authority's copy is complete; it stretches the definition of Critical Energy Infrastructure Information to cover ordinary project cost and scope information; it seeks blanket secrecy for the workpapers of the Company's testifying cost-of-capital witness — the very analysis offered to justify a 10.25% return on equity — on the theory that they are the witness's personal intellectual property; and it proposes no mechanism whatsoever for party and intervenor access to any of this material. The Authority should deny the Motion in part and enter the tailored relief described in Section VI.

I. THE GOVERNING STANDARD

The Authority "operates with the strong presumption that all documents filed with it are public records." Notice of Proceeding at 4; Procedural Order Regarding Protected Materials (July 10, 2026) ("Procedural Order") at 1. A movant must "provide more than conclusory language, generalized allegations or mere arguments of counsel. Rather, a sufficiently detailed record must reflect the reasons why an exemption applies to the materials requested." *New Haven v. Freedom of Information Commission*, 205 Conn. 767, 776 (1988); Procedural Order ¶ 3. The exemptions of

Conn. Gen. Stat. § 1-210(b) are permissive, not mandatory, and disclosure remains within the agency's discretion even where an exemption could apply. Procedural Order at 2 n.1 (collecting authority). And the Authority has already refused the Company's attempt, by its May 5, 2026 correspondence, to excuse itself from filing public redacted copies of high-volume confidential material: "The Authority does not accept this proposal." Procedural Order at 2 n.2.

II. THE FIFTY-TWO INTERNAL AUDIT REPORTS (OCC-307).

A. The confidential-only submission violates the Procedural Order. The Company filed OCC-307, Attachments 1 through 52, "as confidential-only documents" with no public redacted version. Motion ¶ 16. The Procedural Order is explicit: "As a general rule, parties and intervenors may not submit bulk filings confidentially without a redacted version submitted publicly," and a party seeking to do so must file a motion demonstrating "extraordinary circumstances," with "[s]heer volume" expressly insufficient. Procedural Order ¶ 6. The Company filed no such motion and demonstrates no extraordinary circumstance; the Motion simply announces that the documents were submitted confidential-only two weeks ago. This is the same relief the Authority already denied in footnote 2 of the Procedural Order, now taken by self-help.

B. The unilateral relevance redactions are unauthorized. The Motion discloses that "many of" the fifty-two audit reports "are also redacted for relevance." Motion ¶ 16. No provision of the Procedural Order, and no ruling of the Authority, authorizes a responding party to excise portions of responsive documents on its own relevance determination — least of all from the *confidential* version, which exists precisely so that the Authority may review the complete document. Protective treatment addresses public disclosure; it is not a license to withhold content from the Authority and the parties. The result of the Company's approach is that no one — not the Authority, not the Office of Consumer Counsel, not any intervenor — has seen the complete documents, and the Company alone has decided what the record contains. The Authority should order the complete, unredacted audit reports submitted, and should direct that any claim that particular content is beyond the scope of the interrogatory be raised by objection, not by silent excision.

C. The confidentiality showing is conclusory. The Motion offers a single, categorical rationale for all fifty-two documents: that audits involve "candid self-assessments" and that

disclosure "would have a chilling effect on the audit process." Motion ¶ 15. A "chilling effect" is not an exemption under Conn. Gen. Stat. § 1-210(b). The Company must show, per document, that the material is a trade secret or commercial or financial information given in confidence, § 1-210(b)(5), or presents a genuine safety or IT-security risk, § 1-210(b)(19), (20). A blanket assertion across fifty-two documents of undisclosed subject matter is precisely the "conclusory language" that *New Haven* forbids. That internal audits appear on the Procedural Order's list of categories that *may* be redacted prior to review (Procedural Order at 3, item 7) establishes only a filing convenience; it does not relieve the Company of its burden when protective treatment is contested, nor does it address the separate violations described above. The audit reports analyze the very "business strategies, operating practices, and systems" (Motion ¶ 15) whose costs the Company asks ratepayers to bear; their bearing on the prudence issues in this case gives the public interest in disclosure unusual weight.

III. THE CEII DESIGNATION OF PROJECT AUTHORIZATION DOCUMENTS (OCC-346).

The Company designates the entirety of seven project authorization packages as CEII and safety-risk material. Motion ¶¶ 6-14. The federal definition it invokes is narrower: CEII is "specific engineering, vulnerability, or detailed design information" that, among other things, "[d]oes not simply give the general location of the critical infrastructure." 18 C.F.R. § 388.113(c)(2). One-line diagrams, engineering schematics, and equipment-level vulnerability assessments may qualify. But project authorization documents also contain ordinary business content — project scopes, cost estimates, anticipated work hours, alternatives considered, and justifications — that is not engineering or design detail, and that the Procedural Order treats as presumptively public: "aggregate numbers" and "estimates" are on the list of information that is "generally not subject to protected treatment." Procedural Order at 3-4. Indeed, the Company's own theory of economic harm — that vendors could use "the nature, scoping and anticipated hours of work" in bidding (Motion ¶ 12) — concedes that this content is commercial information, to be evaluated under § 1-210(b)(5), not infrastructure-security material to be withheld wholesale. The redactions should be narrowed to genuinely sensitive engineering and vulnerability detail, with cost, scope, and justification information disclosed.

The Authority should also decline the Company's invitation (Motion ¶ 10) to "rethink the submittal of redacted copies of confidential information" because artificial intelligence makes public filings easier to search and compile. Ease of public access is a feature of the public record, not a threat to be managed. The Company's argument has no limiting principle — it would justify shrinking every public filing in every docket — and it is the third occasion in this proceeding on which the Company has sought to narrow the public record, after the bulk-filing proposal the Authority rejected (Procedural Order at 2 n.2) and the confidential-only audit submission addressed above.

IV. THE COST-OF-CAPITAL WITNESS'S WORKPAPERS (OCC-365)

The Company seeks confidential-only treatment for the workpapers of its cost-of-capital witness, Ms. Bulkley (Attachments 18, 19, and 24), and its cost-of-service consultant, Ms. Nieto (Attachment 33), on the ground that the witnesses' "know-how" is their personal, proprietary intellectual property. Motion ¶¶ 27-28. These are the workpapers behind affirmative expert testimony offered to justify charging Connecticut ratepayers a 10.25% return on common equity. A party that presents expert testimony in a contested rate case submits that testimony to scrutiny; the models, inputs, and calculations underlying it must be available to the Authority and the parties, or the testimony is untestable and entitled to no weight. The precedents the Company cites (Motion ¶ 30) protected consultant models *from public disclosure* while they remained available for review within the proceeding; none holds that a testifying witness's workpapers may be withheld from the litigants themselves. Whatever protective treatment is afforded as against the public, the Authority should make explicit that these workpapers — including native Excel versions with formulas intact — must be produced to parties and intervenors under appropriate undertakings. The same is true of the subscription-based third-party data (Attachments 14-16, 19, 24): shielding it from the public protects the vendors' business model; shielding it from the parties would shield the Company's rate request from scrutiny.

V. SETTLEMENT INFORMATION (OCC-308)

The authorities the Company cites for protecting settlement information (Motion ¶¶ 21-24) concern the admissibility of settlement negotiations and the courts' respect for parties' private confidentiality arrangements. They do not hold that settlement amounts are exempt from regulatory review where cost recovery is or may be at issue. If any judgment, settlement, or related

obligation is reflected, directly or indirectly, in the revenue requirement the Company asks ratepayers to fund, the amounts are material to this case and must be available to the Authority and the parties.

VI. RELIEF REQUESTED

For these reasons, Allco respectfully requests that the Authority: (1) deny the Motion as to OCC-307, Attachments 1 through 52, unless and until the Company files complete, unredacted confidential versions with the Authority and public redacted versions as required by Paragraph 6 of the Procedural Order, with any scope objections raised expressly rather than by excision; (2) narrow the protective treatment of OCC-346, Attachments 1 through 7, to genuinely sensitive engineering, design, and vulnerability detail, with project cost, scope, schedule, and justification information publicly disclosed; (3) condition any protective treatment of OCC-365, Attachments 14 through 33, and OCC-308, Attachment 1, on the Company's production of complete versions — including native Excel workpapers with formulas intact — to parties and intervenors that execute appropriate protective undertakings, within five business days of execution; (4) decline the Company's request to curtail redacted public filings on account of artificial intelligence; and (5) grant the Motion as to customers' individually identifiable information, employee names and personal contact information, and vendor banking information, to which Allco does not object.

ALLCO FINANCE LIMITED

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CERTIFICATION

This is to certify that on this day, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies were served upon each person designated on the Authority's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15.

/s/ Thomas Melone
Thomas Melone