STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

GENCONN ENERGY LLC APPLICATION TO ESTABLISH 2027 REVENUE REQUIREMENTS	:	**DOCKET NO. 26-06-02**
	:	**October 1, 2026**

MOTION FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

GenConn Energy LLC ("GenConn" or the "Company") hereby requests that the Public Utilities Regulatory Authority ("PURA") grant protective treatment as described in this motion to ensure that confidential information provided by the Company in the above-referenced docket is not subject to public disclosure pursuant to the Protective Order filed in this docket on June 30, 2026. As outlined below, certain information provided by the Company on this date in response to an interrogatory issued by PURA on September 17, 2026 ("PURA Set 5") contains confidential, proprietary and/or competitive information related to confidential vendor pricing information and other vendor information from the Company's outside auditor KPMG LLP ("KPMG"), which are highly sensitive and commercially valuable and which the Company understands its vendor treats as confidential. In support of this motion, the Company states as follows:

1. The confidential information addressed in this motion includes information to be provided in: RRU-029 Attachment 1 CONFIDENTIAL, RRU -029 Attachment 2 CONFIDENTIAL, and RRU-029 Attachment 3 CONFIDENTIAL (the "Confidential Information").

Vendor Pricing and Confidential Vendor Information

2. The Confidential Information provides KPMG's 2025 Audit Opinion issued to GenConn (RRU-029 Attachment 1 CONFIDENTIAL), the 2025 engagement letter between

GenConn and KPMG (RRU-029 Attachment 2 CONFIDENTIAL) and communications between the Company and KPMG as part of the audit process (RRU-029 Attachment 3 CONFIDENTIAL). This includes confidential pricing and audit information that constitutes proprietary, commercially sensitive and strategic non-public third-party vendor data, which the Company does not disclose publicly because doing so would cause substantial harm to the Company and its vendors. The information was provided to the Company by its vendors with an expectation of privacy and must be protected from public disclosure in order to ensure that the Company is able to obtain competitive market-based pricing for these services. Prior to filing, the Company conferred with KPMG, which indicated that it considered the Confidential Information to be confidential business information. Public disclosure of the information contained in RRU-029 Attachment 1 CONFIDENTIAL, RRU-029 Attachment 2 CONFIDENTIAL, and RRU-029 Attachment 3 CONFIDENTIAL would harm the Company's vendors by exposing their proprietary financial information to competitors and other potential customers, and would harm the Company in its ability to attract and retain vendors to undertake necessary work at the lowest possible cost.

3. PURA has previously approved requests to protect similar pricing terms as confidential. See 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. 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).

Legal Standard and Basis for Confidential Treatment

4. Collectively, the Confidential Information is exempt from disclosure under Conn. Gen. Stat. §1-210(b). Section 1-210(b)(5)(A) exempts "trade secrets" from disclosure by any public agency, and §1-210(b)(5)(B) exempts from disclosure "[c]ommercial or financial information given in confidence, not required by statute." The Confidential Information includes vendor pricing information and information that KPMG has indicated is considers to be confidential and proprietary, that qualifies as both a "trade secret" and "commercial or financial information given in confidence" that is not required to be produced by statute.

5. The Company has good cause to request that the Confidential Information be afforded protective treatment by PURA and remain protected from public disclosure. The Company and KPMG consider the information contained in RRU-029 Attachment 1 CONFIDENTIAL, RRU-029 Attachment 2 CONFIDENTIAL, and RRU-029 Attachment 3 CONFIDENTIAL to be confidential for the reasons stated herein and does not disclose it publicly.

6. The Office of Consumer Counsel shall have access to RRU-029 Attachment 1 CONFIDENTIAL, RRU-029 Attachment 2 CONFIDENTIAL, and RRU-029 Attachment 3

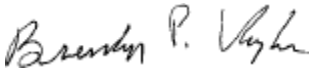
CONFIDENTIAL, pursuant to the terms of the Protective Order filed on June 30, 2026.

7. In this case, the necessity of withholding public disclosure of RRU-029 Attachment 1 CONFIDENTIAL, RRU-029 Attachment 2 CONFIDENTIAL, and RRU-029 Attachment 3 CONFIDENTIAL outweighs the public interest in such disclosure.

8. Attachment A to this motion provides the supporting Affidavit of Devang N. Patel, which attests to the need for protective treatment of RRU-029 Attachment 1 CONFIDENTIAL, RRU-029 Attachment 2 CONFIDENTIAL, and RRU-029 Attachment 3 CONFIDENTIAL.

9. For the foregoing reasons, the Company respectfully requests that PURA grant this motion for protective order.

RESPECTFULLY SUBMITTED,
GENCONN ENERGY LLC



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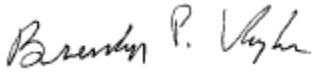
Its Attorney

CERTIFICATION

I hereby certify that on October 1, 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.



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