STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

GENCONN ENERGY LLC	**:**	**DOCKET NO. 26-06-02**
APPLICATION TO ESTABLISH 2027	**:**	
REVENUE REQUIREMENTS	**:**	
	:	
	:	
	:	**June 30, 2026**

MOTION FOR PROTECTIVE TREATMENT
OF CONFIDENTIAL INFORMATION

GenConn Energy LLC ("GenConn" or the "Company") hereby requests that the Public Utilities Regulatory Authority ("PURA") enter a protective order to ensure that confidential information provided by the Company in the above-referenced proceeding is not subject to public disclosure. As outlined below, certain information to be provided by the Company in attachments to the Company's June 30, 2026 initial filing in this matter contain confidential, proprietary and/or competitive information related to proposed annual maintenance scheduled days for GenConn's peaking facilities located in at Devon Station in Milford, Connecticut ("GenConn Devon") and at Middletown Station in Middletown, Connecticut ("GenConn Middletown"), GenConn's contract for differences invoices for both GenConn Devon and GenConn Middletown, and vendor quotes associated with the SCR catalyst, all of which are highly sensitive and commercially valuable and 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 to be provided in Attachments GenConn-06 CONFIDENTIAL, GenConn 07 CONFIDENTIAL, and GenConn-12 CONFIDENTIAL from the Company's Initial Filing (the "Confidential

Attachments").

Annual Scheduled Maintenance Dates

2. GenConn's Attachment GenConn-06 CONFIDENTIAL contains GenConn's 2027 proposed annual maintenance outage scheduled days for the GenConn Devon and GenConn Middletown units. This information is highly confidential and commercially sensitive because the scheduled maintenance outage hours are explicitly tied to the Company's participation in the ISO-NE markets and resulting revenues. Disclosure of GenConn's 2027 annual maintenance scheduled days to the public would allow for other participants to use GenConn's maintenance outage information to influence the market. GenConn arranges bi-lateral coverage for planned outages and that coverage provides value to Connecticut customers by avoiding penalties and reducing cost.

3. PURA has previously approved similar motions requesting protective treatment of the Company's proposed annual maintenance outrage scheduled days. See, e.g., Docket No. 18-06-01, Application of GenConn Energy LLC for Establishment of 2019 Revenue Requirements, (Ruling on Motion No. 01 (June 19, 2018)); Docket No. 19-05-48, Application of GenConn Energy LLC for Establishment of 2020 Revenue Requirements (Ruling on Motion No. 01 (June 24, 2019)); Docket No. 20-06-14, Application of GenConn Energy LLC for Establishment of 2021 Revenue Requirements (Ruling on Motion No. 10 (April 20, 2021)); Docket No. 21-06-28, Application of GenConn Energy LLC for Establishment of 2022 Revenue Requirements (Ruling on Motion No. 1 (July 22, 2021)); Docket No. 22-06-02, GenConn Energy LLC Application to Establish 2023 Revenue Requirements (Ruling on Motion No. 1 (August 9, 2022)); Docket No. 23-06-02, GenConn Energy LLC Application to Establish 2024 Revenue Requirements (Ruling on Motion No. 3 (October 13, 2023)); Docket No. 24-06-02, GenConn Energy LLC Application to Establish 2025 Revenue Requirements (Ruling on Motion No. 1 (August 20, 2024)); Docket No. 25-06-02,

GenConn Energy LLC Application to Establish 2026 Revenue Requirements (Ruling on Motion No. 1 (Dec. 3, 2025)).

Contract for Differences Invoices

4. GenConn's Attachment GenConn-07 CONFIDENTIAL contains GenConn's Contract for Differences settlements and invoices for both of its peaking facilities, GenConn Devon and GenConn Middletown, as billed by ISO New England. These invoices detail GenConn's monthly actual emissions allowance expenses, monthly VAR revenues, monthly forward capacity revenues, availability advances and billing adjustments. GenConn considers these invoices to be commercially and competitively sensitive and highly proprietary information. GenConn vigorously and routinely protects this type of information because if disclosed it could irreparably harm the Company's competitive position.

5. PURA has previously approved treating similar Contact for Differences invoices as confidential when produced by GenConn. See, e.g., Docket No. 18-06-01, Application of GenConn Energy LLC for Establishment of 2019 Revenue Requirements, (Ruling on Motion No. 01 (June 19, 2018)); Docket No. 19-05-48, Application of GenConn Energy LLC for Establishment of 2020 Revenue Requirements (Ruling on Motion No. 01 (June 24, 2019)); Docket No. 21-06-28, Application of GenConn Energy LLC for Establishment of 2022 Revenue Requirements (Ruling on Motion No. 1 (July 22, 2021)); Docket No. 22-06-02, GenConn Energy LLC Application to Establish 2023 Revenue Requirements (Ruling on Motion No. 1 (August 9, 2022)); Docket No. 23-06-02, GenConn Energy LLC Application to Establish 2024 Revenue Requirements (Ruling on Motion No. 1 (August 29, 2023)); Docket No. 24-06-02, GenConn Energy LLC Application to Establish 2025 Revenue Requirements (Ruling on Motion No. 1 (August 20, 2024)); Docket No. 25-06-02, GenConn Energy LLC Application to Establish 2026 Revenue Requirements (Ruling on

Motion No. 1 (Dec. 3, 2025)).

Vendor Pricing

6. Attachment GenConn-12 CONFIDENTIAL provides vendor pricing information associated with the replacement of SCR Catalysts at the GenConn facilities. Attachment GenConn-12 CONFIDENTIAL includes confidential pricing terms and other sensitive pricing information obtained by the Company. These commercial terms and information include proprietary, competitive and commercially sensitive information relating to contracts and agreements between the Company and vendor, all of which is non-public information, which, if disclosed publicly, would cause substantial harm to the Company and its vendor.

7. 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

8. The Confidential Attachments are 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 Attachments include vendor pricing, operational information the disclosure of which could be used by bad actors to influence the market, and invoicing and pricing information containing commercially sensitive, and competitive financial information that qualifies as both a "trade secret" and "commercial or financial information given in confidence" that is not required to be produced by statute.

9. Consistent with longstanding practice, the Company is not providing redacted versions of Attachments GenConn-06 CONFIDENTIAL or GenConn-07 CONFIDENTIAL. See Docket No. 25-06-02, GenConn Energy LLC Application to Establish 2026 Revenue Requirements (Ruling on Motion No. 1 (Dec. 3, 2025)) (initial filing omitting redacted versions of Attachments GenConn-06 and GenConn-07 CONFIDENTIAL); Docket No. 24-06-02, GenConn Energy LLC Application to Establish 2025 Revenue Requirements (initial filing omitting GenConn Exhibits 13 and 14 CONFIDENTIAL, which provided planned outage schedule and CfD invoices with no redacted version); Docket No. 23-06-02, GenConn Energy LLC Application to Establish 2024 Revenue Requirements (initial filing omitting GenConn Exhibits 13 and 14 CONFIDENTIAL,

which provided planned outage schedule and CfD invoices with no redacted version).

10. The Company has good cause to request that the Confidential Attachments be afforded protective treatment by PURA and remain protected from public disclosure. The Company considers the information contained in the Confidential Attachments to be confidential for the reasons stated herein and does not disclose it publicly.

11. The Office of Consumer Counsel shall have access to the Confidential Attachments based on the terms of the Protective Order provided as Attachment A to this motion for protective order.

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

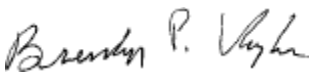
13. Attachment B to this motion provides the supporting Affidavit of Devang N. Patel, which attests to the need for protective treatment of the Confidential Attachments.

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

[signature page follows]

RESPECTFULLY SUBMITTED,

GENCONN ENERGY LLC



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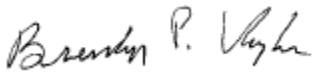
Its Attorney

CERTIFICATION

I hereby certify that on June 30, 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.



Brendan P. Vaughan