STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

GENCONN ENERGY LLC APPLICATION TO ESTABLISH 2027 REVENUE REQUIREMENTS	:	**DOCKET NO. 26-06-02**
	:	**August 19, 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 interrogatories issued by PURA on August 5, 2026 ("PURA Set 2") contains confidential, proprietary and/or competitive information related to GenConn's contract for differences invoices, and confidential vendor pricing information and responses to requests for proposals ("RFPs"), 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: RRU-010 Attachment 3 CONFIDENTIAL, RSR-002 Attachment 1 CONFIDENTIAL, and RSR-004 Attachment 1 CONFIDENTIAL (the "Confidential Attachments").

Contract for Differences Invoices

2. RRU-010 Attachment 3 CONFIDENTIAL provides information on GenConn's Contract for Differences ("CfD") invoices for both of its peaking facilities, GenConn Devon and

GenConn Middletown, as billed by ISO New England that were associated with significant ISO-NE dispatch in December 2025 to date in 2026. 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.

3. 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 and Bid Responses

4. RSR-002 Attachment 1 CONFIDENTIAL, and RSR-004 Attachment 1 CONFIDENTIAL provide responses to bids and pricing proposals that contain competitive vendor pricing information. This pricing information 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. Public disclosure of the information contained in RSR-002 Attachment 1 CONFIDENTIAL, and RSR-004 Attachment 1 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.

5. 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

6. Collectively, 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 bids and pricing information, and CfD invoicing 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.

7. 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.

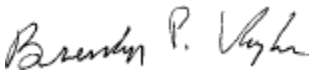
8. The Office of Consumer Counsel shall have access to the Confidential Attachments pursuant to the terms of the Protective Order filed on June 30, 2026.

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

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

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

RESPECTFULLY SUBMITTED,
GENCONN ENERGY LLC

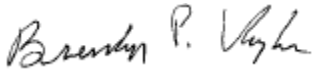


Brendan P. Vaughan, Esq.
Keegan Werlin LLP
1 Liberty Square, Third Floor
New Britain, CT 06051
(617) 951-1400
bvaughan@keeganwerlin.com

Its Attorney

CERTIFICATION

I hereby certify that on August 19, 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