STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY

PETITION OF THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY FOR PURA REVIEW OF ADVANCED METERING INFRASTRUCTURE IMPLEMENTATION PLAN	:	**DOCKET NO. 26-07-XX**
		JULY 21, 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") submits this motion to the Public Utilities Regulatory Authority ("PURA") to request that PURA grant protective treatment as described in this motion to ensure that confidential information provided by CL&P in the above-referenced proceeding is not subject to public disclosure, pursuant to the Protective Order included as Attachment A to this motion. As outlined below, an exhibit being provided by the Company on July 21, 2026, in support of its Advanced Metering Infrastructure Implementation Plan, contains confidential, proprietary, and/or competitive information related to vendor pricing, internal procurement processes, negotiated contracts with third parties, and individual employee and contractor contact information, which the Company does not disclose publicly (the "Confidential Information").

In support of this motion, the Company states as follows:

The confidential information addressed in this motion includes certain information to be provided in Exhibit CLP-AMI-2, Appendix.

Confidential Information – Vendor Proposals and Evaluations

1. Exhibit CLP-AMI-2, Appendix presents documentation related to responses to requests for proposals. The information on terms, fees, rates, negotiated agreements, and unit quantities and price terms set forth in these various agreements and invoices include proprietary, competitive, and commercially sensitive information that is non-public information, including vendor's bids for services, unit cost information, and bid quantity information that is competitive to the vendor. 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. Additionally, the Confidential Information in these exhibits includes employee names, employee signatures, and employee contact information, the disclosure of which could cause increased security risks due to an exponential increase in online fraud. The Company attempts to prevent public disclosure of this information due to security and financial risks in having this information publicly known, especially as may be related to computer security, phishing, social engineering, and other targeted scams and malfeasance involving fraudulent activities and communications.

2. PURA has previously granted protective treatment to maintain negotiated vendor pricing and commercially sensitive 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, (December 18, 2024 Ruling to Motion No. 5) (protecting as confidential vendor invoices and pricing information); Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Jan. 12, 2023 Ruling on Motion No. 48) (protecting as confidential a Company's internal evaluations of vendor responses to RFPs); 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. 13-03-23, 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) (protecting confidential vendor pricing information).

3. Additionally, PURA has previously protected employee names, employee signatures, and employee contact information as confidential, as well as vendor contact information. In Docket No. 24-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company, PURA approved The Connecticut Light and Power Company d/b/a Eversource Energy's ("CL&P") motion for reconsideration for protection to

Eversource employee names and contact information ("Docket No. 24-01-03 Motion No. 28 Ruling"). CL&P articulated the increased security risks triggered by making employee contact information publicly available. See Docket No. 24-01-03 Motion No. 28 Ruling, at 2. PURA found that the Eversource email addresses, phone numbers, and non-public addresses of certain Eversource employees were exempt from public disclosure as information that constitutes commercial or financial information given in confidence and not required by statute. See id.; Conn. Gen. Stat. § 1-210(b)(5)(B). PURA has also previously protected employee contact information from public disclosure in other instances. See, e.g., Docket No. 24-12-01, Application of Yankee Gas Services Company d/b/a Eversource Energy to Amend Its Rate Schedules, (May 16, 2025 Ruling to Motion No. 72) (protecting as confidential employee and vendor contact information); Docket No. 24-03-01, Annual Review of the System Expansion Reconciliation Mechanisms (July 22, 2024 Ruling to Motion No. 4) (protecting employee contact information); 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 (October 25, 2021 Ruling to Motion No. 7) (protecting employee names, addresses, and telephone numbers).

Use of Artificial Intelligence ("AI")

4. The attached Protective Order provided herewith as Attachment A has been updated to contain the Company's proposal governing the relationship between Confidential Information and AI models. The Company generally recommends following the approach already endorsed by the State of Connecticut, in its Artificial Intelligence ("AI") Policy, Policy AI-01 AI Responsible Use Framework, as explained in the attached Protective Order, with notification to the Company in certain circumstances.

Request for Relief

5. Overall, Exhibit CLP-AMI-2, Appendix is exempt from disclosure under Conn. Gen. Stat. §1-210(b). Records when there are reasonable grounds to believe disclosure may result in a safety risk such as employee and contractor personal information are excepted from FOIA pursuant to Conn. Gen. Stat. §1-210(b)(19). 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." Exhibit CLP-AMI-2, Appendix includes vendor pricing information, and negotiated contractual agreements 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.

6. CL&P has good cause to request that Exhibit CLP-AMI-2, Appendix be afforded protective treatment by PURA and remain protected from public disclosure. CL&P maintains vendor pricing, internal procurement processes, negotiated contracts with third parties, and individual employee and contractor contact information, as contained in Exhibit CLP-AMI-2, Appendix as confidential and does not disclose such information publicly.

7. Although this Motion identifies information in Exhibit CLP-AMI-2, Appendix that constitutes confidential data that is exempt from public disclosure under FOIA, the Company is also providing a public, redacted version of this Appendix that publicly discloses the non-confidential information in this Appendix.

8. The Office of Consumer Counsel shall have access to Exhibit CLP-AMI-2, Appendix pursuant to the terms of the Protective Order provided herewith as Attachment A.

9. The Attorney General shall have access to Exhibit CLP-AMI-2, Appendix pursuant to the terms of the Protective Order upon execution of the Protective Order.

10. The Office of Consumer Counsel's consultants and PURA's consultants shall have access to Exhibit CLP-AMI-2, Appendix pursuant to the terms of the Protective Order upon execution of the Non-Disclosure Agreement in the Protective Order.

11. In this case, the necessity of withholding public disclosure of Exhibit CLP-AMI-2, Appendix outweighs the public interest in such disclosure.

12. Attachment B to this motion provides the supporting Affidavit of Company Witness Jared A. Lawrence, which attests to the need for protective treatment of Exhibit CLP-AMI-2, Appendix.

13. 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

By: *Vincent P. Pace*

Vincent P. Pace
Eversource Energy
P.O. Box 270
Hartford, CT 06410-0270
Phone: 860-665-5426
Fax: 860-665-5504
Vincent.Pace@eversource.com

By: S. Pardee

Sarah Pardee
Keegan Werlin LLP
1 Liberty Square, 3rd Fl.
New Britain, CT 06051
Phone: (617) 951-1400
SPardee@keeganwerlin.com

Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on this date a copy of the foregoing was sent to the service list in compliance with R.C.S.A. §16-1-15.

S. Pardee

Sarah A. Pardee
Commissioner of the Superior Court