STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

ANNUAL EV CHARGING PROGRAM REVIEW – YEAR 6	**:**	**DOCKET NO. 26-08-06**
	:	**NOVEMBER 3, 2026**

MOTION FOR PROTECTIVE ORDER OF THE CONNECTICUT LIGHT AND POWER COMPANY D/B/A EVERSOURCE ENERGY

1. The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or the "Company") requests that the Public Utilities Regulatory Authority ("PURA") issue a protective order in this docket to ensure that confidential information provided in Q-CAE-002, Attachment 2 is not subject to public disclosure.

2. More specifically, the confidential information in Q-CAE-002, Attachment 2 contains customer information consisting of street addresses and the latitudes and longitudes of customers (collectively, "Confidential Information"). None of this information has been publicly disclosed or is known or readily available to the public, and the Company has taken steps to maintain the confidentiality of this information. The public disclosure of the Confidential Information would be contrary to the expectation of privacy of the Company's customers.

3. Connecticut law and Company policy prohibit Eversource from publicly disclosing information about its customers without such customers' written consent. See, e.g., Conn. Agencies Regs. § 16-244h-4(a)(2) (stating that "[a]n electric distribution company shall receive prior affirmative written customer consent before releasing any customer information not referenced in subdivision (1) of this subsection."). Docket No. 98-06-13, DPUC Report to the General Assembly on Aggregation, at 12 (Dec. 23, 1998

Decision) (stating that "[c]ustomers have certain privacy rights under federal and state law that protect them from any harm that may result from unauthorized release or use of personal information.").

4. If the Company were to publicly disclose the Confidential Information, absent the consent of each affected customer, the Company could be exposed to legal claims from such customers, including but not limited to, complaints made to the Office of the Attorney General and the Connecticut Department of Consumer Protection.

5. The Confidential Information is also exempt from public disclosure as "[c]ommercial or financial information given in confidence, not required by statute." Conn. Gen. Stat. § 1-210(b)(5)(B). This information qualifies under this category of protected information because it is: (a) commercial or financial information; (b) given in confidence; and (c) not required by statute. The first element of this standard is satisfied because this information falls within the plain, ordinary meaning of "commercial information." See e.g., Black's Law Dictionary (10th ed. 2014), commercial. The second element of this standard is also satisfied because this information was intended to remain private. Lastly, the information qualifies under this exemption because the public disclosure of this information is not required by statute. Eversource is producing this information as part of its response to a PURA interrogatory issued in the above-captioned proceeding, and not pursuant to a statutory mandate to disclose such information at this time.

6. The attached affidavit of Kevin Boughan, Manager, Strategy & Business Development for Eversource addresses the need for protective treatment of this information.

7. Neither federal nor Connecticut statutes requires the Company to submit this information.

8. The necessity of withholding public disclosure of this Confidential Information outweighs the public interest in such disclosure.

9. For the above reasons, the Company respectfully requests that PURA grant this Motion for Protective Order.

RESPECTFULLY SUBMITTED,
EVERSOURCE ENERGY

Daniel Crisp

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Dated: November 3, 2026

CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was sent to the official service list in this proceeding in compliance with Conn. Regs. § 16-1-15, as amended.

Daniel T. Crisp

Daniel T. Crisp, Esq.
Commissioner of the Superior Court

STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

DOCKET NO. 26-08-06

ANNUAL EV CHARGING PROGRAM
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AFFIDAVIT OF

KEVIN BOUGHAN

I am over the age of eighteen and understand the obligations of making statements under oath. The following statements are true to the best of my knowledge and belief.

1. I am Kevin Boughan, Manager, Strategy & Business Development, and I am employed by The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or the "Company").

2. Specifically, I submit this affidavit in support of a Motion for Protective Order, of even date herewith ("Motion"), as it relates to the Confidential Information (as defined in the Motion), in Q-CAE-002, Attachment 2, which contains customer information consisting of street addresses and the latitudes and longitudes of customers. None of this information has been publicly disclosed or is known or readily available to the public, and the Company has taken steps to maintain the confidentiality of this information. The public disclosure of the Confidential Information would be contrary to the expectation of privacy of the Company's customers.

3. To the best of my knowledge, reasonable efforts have been used to keep and maintain as confidential this information, and to the best of my knowledge, this information has not been disclosed or released to the public.

4. I have been advised by the Company's legal counsel that neither federal nor Connecticut statutes requires this information to be filed in the public record.

Kevin Boughan

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Kevin Bougan

Subscribed and sworn before me this 3rd day of November 2026.

Daniel Crisp

Daniel Crisp
Commissioner of the Superior Court
CT Juris No. 429076
*Virtual acknowledgement