STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

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

MOTION FOR PROTECTIVE ORDER
OF THE UNITED ILLUMINATING COMPANY

The United Illuminating Company ("UI" 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. In support of this motion, UI states as follows:

1. 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.

2. Connecticut law and Company policy prohibit UI from publicly disclosing information about its customers without such customers' written consent. See, 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.").

3. The public disclosure of the Confidential Information would be contrary to the expectation of privacy of the Company's customers.

4. 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.

5. PURA recognizes that "[c]ustomers' individually identifiable information (e.g., names, phone numbers, utility account numbers, bank account information, email addresses, and physical addresses)" constitute information typically subject to protected treatment. Docket No. 24-10-04, Application of The United Illuminating Company to Amend its Rate Schedules (Jan. 15, 2025 Procedural Order at 2). Additionally, PURA has previously protected from public disclosure account-specific information of utility customers. See, e.g., Docket No. 22-08-08, Application of The United Illuminating Company to Amend its Rate Schedules (Oct. 6, 2022 Ruling on Motion No. 8) (protecting as confidential customer account specific information); Docket No. 20-08-03, PURA Investigation into Electric Distribution Companies' Preparation and Response to Tropical Strom Isaias (Dec. 7, 2020 Ruling on Motion No. 32) (protecting as confidential customer-specific information), (Dec. 8, 2020 Ruling on Motion No. 36) (protecting as confidential customer specific information).

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

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

8. Attached in support of this motion is the Affidavit of Brian Morris. The affidavit addresses the need for protective treatment of the Confidential Information described in this motion.

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

Respectfully submitted,

THE UNITED ILLUMINATING COMPANY

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CERTIFICATION

This is to certify that on this day, the foregoing document was filed with the Public Utilities Regulatory Authority, and copies of the foregoing document were served upon each person designated on the Authority's official service list in this proceeding in accordance with R.C.S.A. § 16-1-15. Confidential materials have been provided to Public Utilities Regulatory Authority under separate cover.

By: *Alex E. Soter*
Alex E. Soter
Counsel

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AFFIDAVIT

I am over the age of eighteen and understand the obligations of making statements under oath. I, Brian Morris, state that the following statements are true to the best of my knowledge and belief.

1. I am Senior Manager of Clean Energy Policy for The United Illuminating Company ("UI" or the "Company"). My business address is 180 Marsh Hill Road, Orange, Connecticut 06477.
2. I am submitting this affidavit in support of UI's motion for protective treatment of confidential information provided in Q-CAE-002, Attachment 2, which contains customer information consisting of street addresses and the latitudes and longitudes of customers ("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. To the best of my knowledge, reasonable efforts have been used to keep and maintain the Confidential Information as confidential; 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 require this Confidential Information to be filed in the public record.

Brian Morris

_____

Brian Morris

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



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Alex E. Soter
Commissioner of the Superior Cour