STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

NON-WIRES SOLUTIONS PROCESS	**:**	**DOCKET NO. 26-08-08**
CYCLE 2	**:**	**MAY 8, 2026**

JOINT MOTION OF THE UNITED ILLUMINATING COMPANY AND THE CONNECTICUT LIGHT & POWER COMPANY FOR PROTECTIVE ORDER

The Connecticut Light and Power Company d/b/a/ Eversource Energy ("Eversource") and The United Illuminating Company ("UI", and collectively with Eversource, the "EDCs") request that the Public Utilities Regulatory Authority ("PURA" or the "Authority") amend the Protective Orders[1] in the above-referenced docket, so as to provide confidential treatment to certain information contained within the EDCs' Compliance with the Procedural Order.

1. On April 17, 2026, PURA issued a Procedural Order, which directed the EDCs submit compliance containing: the Benefit-Cost Analysis Tool (the "BCA Tool"); a narrative description of the BCA Tool; and an example of how the BCA Tool would be used or has been used to evaluate the feasibility of pursuing an alternative to traditional wires solution at the screening phase. See, Procedural Order at 2.

2. The EDCs' Compliance with the Procedural Order contains confidential information (the "Confidential Information"). The Confidential Information includes analytical tools which third-parties may derive independent economic value from. Further, the Confidential Information also contains commercial and/or financial information, given to the EDCs in confidence.

3. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(A), PURA is authorized to protect from public disclosure "[t]rade secrets… that (i) derive independent economic value, actual or potential, from not being generally known to… other persons who can obtain economic value from their disclosure

[1] On February 24, 2026, PURA approved UI's and Eversource's respective motions for protective order in the Authority's Rulings on Motion Nos. 1 and 2.

or use, and (ii) are the subject of efforts that are reasonable under the circumstances to maintain secrecy."

4. Pursuant to Conn. Gen. Stat. § 1-210(b)(5)(B), PURA is authorized to protect from public disclosure "[c]ommercial or financial information given in confidence, not required by statute."

5. In accordance with the Final Decision in Docket No. 24-08-08 and pursuant to the terms of the EDCs' respective Protective Orders, the Authority, the Process Monitor, OCC, DEEP, and any other compliant stakeholders shall have access to the Confidential Information.

6. The attached affidavit of Maritza Estremera Jimenez, Program Manager, Non-Wires Solutions, addresses the need for protective treatment of UI's Confidential Information.

7. The attached affidavit of Lavelle A. Freeman, the Vice President, Distribution and System Planning, addresses the need for protective treatment of Eversource's Confidential Information.

8. The Confidential Information is subject to reasonable efforts by the EDCs to maintain its secrecy.

9. Neither federal nor Connecticut statutes requires the EDCs to submit the Confidential Information

10. For the above reasons, the EDCs respectfully request that PURA grant this Motion for Protective Order.

SIGNATURE PAGE FOLLOWS

Respectfully submitted,

THE UNITED ILLUMINATING COMPANY

By: *Alex E. Soter*

Alex E. Soter
Counsel
UIL Holdings Corporation
180 Marsh Hill Road
Orange, CT 06477
Phone: 203-836-4603
E-mail: alex.soter@avangrid.com

THE CONNECTICUT LIGHT & POWER COMPANY dba EVERSOURCE ENERGY

By: *Vincent P. Pace*

Vincent Pace
Eric Eggleston
107 Selden Street
Berlin, CT 06037
Phone: 860-665-5426
E-mail: vincent.pace@eversource.com

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