STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

NON-WIRES SOLUTIONS PROCESS CYCLE 2	:	**DOCKET NO. 26-08-08**
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	:	**MARCH 31, 2026**

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

The Connecticut Light and Power Company d/b/a Eversource Energy ("Eversource" or the "Company") hereby moves that the Public Utilities Regulatory Authority ("PURA") grant protective treatment as described in this motion to ensure that certain confidential information provided by the Company in the above-referenced proceeding is not subject to public disclosure, pursuant to the Protective Order submitted to PURA on February 24, 2006. As outlined below, certain information provided by the Company in response to interrogatories issued by PURA's Reliability, Security, Resiliency ("RSR") Unit on March 10, 2026 ("RSR Set 1")[1] contain confidential design and pricing information, which the Company does not disclose publicly. Specifically, the Company requests that the following attachments be protected from public disclosure: Attachments 1 and 2 to Q-RSR-004, Attachment 1 to Q-RSR-005, Attachment 1 to Q-RSR-011, and Attachments 1, 2a, 2b, and 3 to Q-RSR-012 and Q-RSR-013 (the "Confidential Design Attachments"); Attachments 2 and 3 to Q-RSR-011 (the "Confidential Pricing Attachments"); and Attachment 1 to Q-RSR-003 (together with the Confidential Design

[1] The Company submitted a Motion for Extension of Time for RSR Set 1 on March 18, 2026 ("Motion No. 3") requesting an extension until March 31, 2026. PURA granted Motion No. 3 on March 23, 2026.

Attachments and the Confidential Pricing Attachments, the "Confidential Information"). In support of this motion, the Company states as follows:

1. The Confidential Design Attachments contain one-line diagrams, alternative solutions, proposed locations of projects, numbers in the text related to the number of critical customers served by a circuit, the length of a circuit, outage data associated with a particular circuit, and proposed reliability information for specific circuits. The Confidential Design Attachments show the existing and proposed future configuration of the Company's backbone of distribution circuits, with detailed engineering information about proposed and existing critical infrastructure, depicting and describing device locations with specificity.

2. Publicly disclosing the specific, detailed engineering and design information contained in the Confidential Design Attachments would compromise the safety and security of the electric system if that information fell into the hands of a bad actor (such as a terrorist or another nation state) that intended to use the confidential information for harmful purposes. This information could be useful to a person planning an attack on the Company's critical infrastructure. Specifically, this information can be used for cyberattacks on the Company's critical infrastructure or for personal attacks on specific customers or critical facilities served by this infrastructure. The Confidential Design Attachments therefore constitute CEII as defined by FERC[2] and must be protected from public disclosure. Conn. Gen. Stat. § 1-210(b)(19) exempts from public disclosure such CEII information stating that there is an exemption for "[r]ecords when there are reasonable grounds to believe disclosure may result in a safety risk, including the risk of harm to any person,

[2] CEII is "specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (i) relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) could be useful to a person in planning an attack on critical infrastructure; (iii) is exempt from mandatory disclosure under the Freedom of Information Act; and (iv) does not simply give the general location of the critical infrastructure." 18 C.F.R. § 388.113.

any government-owned or leased institution or facility"; and § 1-210(b)(19) defines "government-owned or leased institution or facility" as including a "facility owned or leased by a public service company, as defined in section 16-1".

3. Pursuant to Conn. Gen. Stat. § 1-210(b)(5), PURA is authorized to protect from public disclosure both "trade secrets" and "[c]ommercial and financial information given in confidence, not required by statute." Trade secrets include information that would "(i) derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use, and (ii) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy." Conn. Gen. Stat. § 1-210(b)(5)(A).

4. The Confidential Pricing Attachments contain summaries of pricing information from various bidders, used to develop the Company's cost estimate for energy storage capacity used in the Company's initial filings in this Docket. The Confidential Pricing Attachments constitute trade secrets. There is actual independent economic value in vendor pricing and the results of the Company's Request for Information not being known to, or not being readily ascertainable by, CL&P's current and prospective vendors, the competitors of these particular vendors, and the general public. This information is also the subject of efforts by the Company that are reasonable under the circumstances to maintain the secrecy of such information. The Company's potential bidders should not have access to past bid amounts because it would provide a significant advantage in the solicitation process, potentially skewing the results and contents of proposals. By maintaining pricing information as confidential, the Company is assured that potential bidder proposals are based on the market and the bidder's qualifications, not previous vendor responses.

5. PURA is also authorized to protect from public disclosure "[c]ommercial and financial information given in confidence, not required by statute." Conn. Gen. Stat. § 1-210(b)(5)(B). The information in the Confidential Information is commercial and/or financial information; it is given to PURA in confidence, and the disclosure is not a result of any statutory requirement. For the reasons described above, the information in the Confidential Design Attachments and the Confidential Pricing Attachments also qualifies as commercial or financial information given in confidence, not required by statute, and therefore should be exempt from disclosure.

6. Q-RSR-003, Attachment 1 Confidential responds to a question from RSR based on System Data Requirement No. 9 of the Company's February 6, 2026 annual filing. The data pertaining to System Data Requirement No. 9 have already been approved as a confidential filing by PURA in Exhibit A to its December 18, 2024 Final Decision in Docket No. 24-08-08, Non-Wires Solutions Process Initiation Phase. Because the Company's response to RSR-003 provides additional detail to this confidential filing, the response should also be protected under the same provision in Docket No. 24-08-08.

7. The Office of Consumer Counsel and the Department of Energy & Environmental Protection shall have access to the Confidential Information based on the terms of the Protective Order submitted to PURA on February 6, 2026.

8. Neither federal law nor Connecticut statutes require that the Company submit the Confidential Information. In this case, the necessity of withholding public disclosure of the Confidential Information outweighs the public interest in such disclosure.

9. Attached in support of this motion is the Affidavit of Lavelle A. Freeman, Vice President of Distribution System Planning for Eversource Energy Service Company. The affidavit addresses the need for protective treatment of the Confidential Information described in this motion.

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

RESPECTFULLY SUBMITTED,

THE CONNECTICUT LIGHT AND POWER COMPANY d/b/a EVERSOURCE ENERGY

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CERTIFICATION

I hereby certify that on March 31, 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.

Eric Eggleston

Eric Eggleston
Commissioner of the Superior Court