**STATE OF CONNECTICUT**
**PUBLIC UTILITIES REGULATORY AUTHORITY**

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| **NON-WIRES SOLUTIONS PROCESS CYCLE 2** | : | **DOCKET NO. 26-08-08** |
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| | : | **JUNE 17, 2026** |

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

1. 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, 2026. Eversource filed a motion ("Motion No. 7") on May 8, 2026 requesting a full panel review to discuss the Company's concerns with complying with PURA's April 16, 2026 Ruling on Motion No. 5 (the "Motion No. 5 Ruling"). Specifically, the Company argued in Motion No. 7 that, while PURA granted the redaction of Critical Energy Infrastructure Information ("CEII"),[1] certain information that was not specifically listed as CEII in the Motion No. 5 Ruling could be used by potential bad actors to expose the vulnerabilities in Eversource's system. Accordingly, the Company requested a technical meeting for the Company's subject matter experts to explain the concern or, alternatively, requested PURA to allow the Company to file sample documents that

[1] 18 C.F.R. § 388.113(c)(2) defines CEII: "Critical energy infrastructure information means 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, 5 U.S.C. § 552; and (iv) Does not simply give the general location of the critical infrastructure."

show the additional information the Company proposes to redact. Motion No. 7 at 7-8. PURA's May 27, 2026 Ruling on Motion No. 7 (the "Motion No. 7 Ruling") directed the Company to file a sample of documents that show the additional information the Company proposes to redact. Motion No. 7 Ruling at 2. Eversource hereby submits Attachment 1 to Q-RSR-012 and Attachment 1 to Q-RSR-003 as the requested sample documents (the "Confidential Attachments") in accordance with the Motion No. 7 Ruling.

2. The Company proposes redacting the following from the Confidential Attachments, in accordance with the exemption from disclosure provided in Conn. Gen. Stat. §1-210(b)(19): (i) the Project Need Statement ("Statement") in its entirety, which includes references to transformer and substation names, locations, ages, condition of the equipment, loading forecast, and Company rankings or other assessments; (ii) all other references throughout the Confidential Attachments to the previously-mentioned data individually; (iii) technical justifications; (iv) project scopes; (v) potential alternative solutions studied; (vi) results of Substation Constructability Reviews; and (vii) engineering schematics, maps, photographs, and diagrams. The Company also proposes redacting Eversource employee names from the Confidential Attachments, in accordance with the exemptions from disclosure provided in Conn. Gen. Stat. §§ 1-210(b)(2) and 1-210(b)(5)(B).

3. Conn. Gen. Stat. § 1-210(b)(19) exempts from public disclosure "[r]ecords when there are reasonable grounds to believe disclosure may result in a safety risk, including the risk of harm to any person, any government-owned or leased institution or facility or any fixture or appurtenance and equipment attached to, or contained in, such institution or facility…as used in this section, "government-owned or leased institution or facility" includes, but is not limited to, an institution or facility owned or leased by a public service company."

4. The items listed in Paragraph 2(i) through (vii) above meet the definition of records described as exempt by Conn. Gen. Stat. § 1-210(b)(19). The information relates details about the distribution of energy throughout the Company's system, describes vulnerabilities outlined in project filings that could be useful to a person or entity planning an attack on critical infrastructure, and gives specific details about the location of the equipment. Public disclosure of this information creates a safety risk to facilities owned by the Company, as well as potentially resulting in a safety risk for the public.

5. The Company asserts that the entirety of the Statement, technical justifications, project scope narratives, and descriptions of alternative solution considerations be protected from disclosure under the exemption permitted by Conn. Gen. Stat. § 1-210(b)(19). These sections of the Confidential Attachments provide narrative descriptions of the specific vulnerabilities of the equipment at issue, including names and location descriptions, the age and general condition of the equipment, and vulnerabilities of adjoining substations and/or circuits. These narratives create a roadmap for potential bad actors to determine weak points in the existing system by describing the vulnerabilities of specific facilities as well as the relationship with other potentially vulnerable facilities.

6. In addition, the Company proposes redacting the results of Substation Constructability Reviews. These constructability reviews are intended to uncover potential issues with the project or needed additions to the project to address vulnerabilities not originally considered. The reporting of these reviews contained in the Confidential Attachments illustrates needed upgrades to existing stations to eliminate these issues. For that reason, the results of these reviews contain information that meets the exemption for disclosure under Conn. Gen. Stat. § 1-210(b)(19).

7. The Company also proposes redacting facility names, schematics, photographs, diagrams and maps throughout the Confidential Attachments. This information can be used to locate the substations, providing potential bad actors with the locations of facilities requiring equipment replacements. The safety risk of the Company's facilities due to providing this information publicly is not merely theoretical, as threats and risks to energy infrastructure are increasing. Motion No. 7 at 5-6. This information is therefore exempt from disclosure under Conn. Gen. Stat. § 1-210(b)(19).

8. The redactions proposed in the Confidential Attachments are more numerous and cover more information than other similar documents previously afforded protective treatment by PURA. *See* Docket No. 26-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company, March 10, 2026 Ruling on Motion No. 6 (providing protective treatment to one-line diagrams and transmission-related CEII). However, this docket introduces an important difference that must be considered in the context of Conn. Gen. Stat. § 1-210(b)(19). In Docket No. 26-01-03, the project documentation represented completed projects, where the project itself has removed the vulnerability or risk of damage. In this docket, the projects described are proposed projects, meaning the vulnerabilities exist today. This prospective look at potential projects the Company will implement in the future, providing knowledge of the current system vulnerabilities rather than where vulnerabilities have already been addressed, heightens the safety risk to Eversource's facilities and therefore heightens the sensitivity of the information contained in the Confidential Attachments.

9. In addition to the prospective vs. retrospective context of the information provided in the Confidential Attachments, the Company also recognizes the impact of technological advances, particularly Artificial Intelligence ("AI"), on the ability of potential bad actors to access,

compile, and organize significant amounts of information across years of public filings in PURA dockets and other communications in mere minutes. Where in the past, an individual or entity would need to spend significant resources manually researching dockets and saving filings without confidence that they had found all the relevant documents, a series of fairly simple AI scripts can program an agent to search all filings and save the relevant information in minutes, while including a summary of what it had found. The rapid increase of mapping and geographic image technology available to the public online in recent years also increases the possibility of using AI to compare images available in the Confidential Attachments to those public images to determine fairly precise locations of equipment shown in those images. These technological advances require the Company and PURA, as well as all public agencies and stakeholders, to rethink the submittal of redacted copies of confidential information in the context of weighing the public interest in the disclosure against the risk of making information publicly available and accessible by AI.

10. While not everything in the Confidential Attachments is the type of information listed in Paragraph 5, redacting the entire narrative sections from the Confidential Attachments is a reasonable approach to satisfy the Freedom of Information Act ("FOIA"). The information listed in Paragraph 5 comprises most of the Statement; once that information is redacted, there remains only a series of single words or short phrases which do not provide any useful context to the public. In addition, the Company estimates roughly 1,100 pages of attachments must be reviewed for redactions following PURA's ruling on this Motion. Permitting the Company to redact these entire sections rather than parsing each word over the course of 1,100 pages reduces the time and expense of producing the redactions without reducing the transparency of the final redacted document.

11. The Confidential Attachments also contain Eversource employee names. While not CEII (which is the focus of the Company's Motion No. 7 and PURA's Motion No. 7 Ruling),

the Company nevertheless moves here to protect this information due to the increased volume of attempted phishing attacks that utilities have been facing. Maintaining the confidentiality of Eversource employee names reduces the risk that cyber criminals can learn this information publicly and attempt to use it in cyber scams targeting utility employees to gain access to utility systems.

12. Conn. Gen. Stat. § 1-210(b)(5)(B) exempts from public disclosure "[c]ommercial or financial information given in confidence, not required by statute." The Eversource employee names listed in the Confidential Attachments is commercial information; it is given to PURA in confidence and is not required to be disclosed by any Connecticut statute. Therefore, the Eversource Employee names meet the exemption requirements of Conn. Gen. Stat. § 1-210(b)(5)(B).

13. Conn. Gen. Stat. § 1-210(b)(2) exempts from public disclosure "[p]ersonnel or medical files and similar files the disclosure of which would constitute an invasion of personal privacy." The disclosure of Eversource employee names increases the risk of cyber-attacks targeting specific utility employees as described in Item 2 above, which would constitute an invasion of personal privacy. Therefore, the Eversource employee names meet the exemption requirements of Conn. Gen. Stat. § 1-210(b)(2).

14. PURA granted protective treatment to Eversource employee names as consistent with Conn. Gen. Stat. §§ 1-210(b)(2) and 1-210(b)(5) in the current Rate Adjustment Mechanism ("RAM") docket. *See* Docket No. 26-01-03, PURA Annual Review of the Rate Adjustment Mechanisms of The Connecticut Light and Power Company, June 2, 2026 Ruling on Motion No. 14 (providing protective treatment to, *inter alia*, Eversource employee names).

15. The Company submits both the original and redacted versions of the Confidential Attachments confidentially for protected treatment under this Motion. The purpose of providing the sample redactions is so PURA can review and rule on the merits of redacting the specific information discussed herein. If PURA does not agree with all the Company's redactions, having the redacted versions of these Confidential Attachments publicly available will indicate information that the Company believes is critical, and highlights that to the public. There is no harm done to the public by protecting the redacted versions of the Confidential Attachments during this review; all the attachments subject to the ruling on this Motion will be redacted in accordance with such ruling and filed publicly at that time.

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

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

18. 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 Attachments described in this motion.

19. 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 June 17, 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