STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY

APPLICATION OF THE JEWETT CITY WATER COMPANY TO AMEND ITS RATE SCHEDULES	**:**	**Docket No. 26-08-14**
	:	**October 23, 2026**

MOTION FOR PROTECTIVE ORDER

Pursuant to the Rules of Practice of the Public Utilities Regulatory Authority ("PURA" or the "Authority") and Section 1-210(b)(19) of the Connecticut General Statutes, The Jewett City Water Company ("JCWC" or the "Company") hereby moves the Authority for a Protective Order concerning the information provided to the Authority in Exhibit U to the Application to Amend Rate Schedules filed on this date herewith.

Exhibit U to the Application is an engineering drawing that contains sensitive information pertaining to the Company's water supply system. As a result, there are reasonable grounds to believe disclosure of such information may result in a safety risk, including the risk of harm to JCWC, a water company as defined in Section 25-32a of the General Statutes, and the general public. Accordingly, JCWC requests that the Authority grant this Motion for a Protective Order as it pertains to Exhibit U to the Application under the authority set forth in Section 1-210(b)(19) of the General Statutes.[1]

[1] Section 1-210(b)(19) provides an exception from disclosure under the Freedom of Information Act for records, 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 [defined to include a Section 25-32a "water company"] or any fixture or appurtenance and equipment attached to, or contained in, such institution or facility. . . ." "Such records include, but are not limited to: . . . (ii) [e]engineering and architectural drawings of government-owned or leased institutions or facilities . . ." Conn. Gen. Stat. § 1-210(b)(19).

Attached to this Motion is the Affidavit of Robert Sherwood, President and CEO of JCWC, attesting to the need for protective treatment of the Confidential Information.

WHEREFORE, for the foregoing reasons, JCWC respectfully requests that the Authority grant its Motion for Protective Order with respect to Exhibit U to the Application and issue a Protective Order in the form proposed herein.

Respectfully submitted,

THE JEWETT CITY WATER COMPANY



By:
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CERTIFICATION

This is to certify that a copy of this submission has been sent to all parties and/or intervenors of record via First Class Mail, postage prepaid or via electronic mail on this 23rd day of October, 2026. A copy also been filed with the Authority as an electronic web filing and is complete.



David W. Bogan

AFFIDAVIT

STATE OF CONNECTICUT

ss: ENFIELD

COUNTY OF HARTFORD

Robert Sherwood, being duly sworn, deposes and states that:

1. I am over the age of eighteen and understand the obligation of making a statement under oath.

2. My name is Robert Sherwood, President and CEO of The Jewett City Water Company ("JCWC" or the "Company").

3. I submit this affidavit in support of JCWC's Motion for Protective Order as it relates to confidential information provided to the Public Utilities Regulatory Authority (the "Authority") as part of JCWC's Rate Application in Docket No. 26-08-14.

4. Exhibit U contains JCWC's Distribution Map, which is not subject to public disclosure (the "Confidential Information").

5. The Confidential Information is information that JCWC considers competitively sensitive, confidential information. JCWC has heretofore used best efforts to maintain the Confidential Information as secret in order to avoid the harm that would result if the information were to become publicly available.

6. Given the highly sensitive nature of the Confidential Information, JCWC has heretofore used its best efforts to maintain the information as a secret to ensure that there is no inappropriate access to the Confidential Information. To the best of my knowledge, the Confidential Information has not been disclosed or released to the public by JCWC.

7. Public disclosure of the Confidential Information in the JCWC Rate Application in Docket No. 26-08-14 would allow competitors unfair access to competitive information that could harm JCWC's place in the competitive market, to the Company's detriment.

8. I have been advised by JCWC's legal counsel that neither federal nor Connecticut statutes require the confidential portion of this information to be filed in the public record.

By: _____

Robert Sherwood

President and Chief Executive Officer
Jewett City Water Company

Subscribed and sworn to before me this 23rd day of October, 2026.

_____

David W. Bogan
Commissioner of the Superior Court