Connecticut Industrial Energy Consumers
540 Broadway, P.O. Box 22222, Albany, New York 12201-2222 • (518) 426-4600

November 16, 2026

VIA ELECTRONIC FILING

Jeffrey R. Gaudiosi, Esq.
Executive Secretary
State of Connecticut Public
Utilities Regulatory Authority
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 26-10-11 – Petition of the Office of the Attorney General and Office of Consumer Counsel for Review of AI, Data Security, and Cybersecurity – **CIEC Comments in Support of Joint Petition**

Dear Mr. Gaudiosi,

The Connecticut Industrial Energy Consumers ("CIEC") hereby offers this response in support of the Joint Petition of William Tong, Attorney General for the State of Connecticut, and Claire E. Coleman, Consumer Counsel (collectively, the "Petitioners") filed with the Public Utilities Regulatory Authority ("PURA" or "Authority") on October 13, 2026 ("Joint Petition").

In the Joint Petition, the Attorney General and Consumer Counsel request that the Authority: (1) review and catalog the deployment and use of artificial intelligence ("AI") in the operations of Connecticut's electric, gas, and water utilities;[1] and (2) examine the utilities' data security and cybersecurity practices. The Joint Petition observes that Eversource and Avangrid are increasing their use of AI systems but there is no comprehensive understanding of how those tools are being used or the processes and safeguards in place to ensure that the technology is managed safely and reliably.[2] Further, "AI, data security, and cybersecurity have the capacity to touch all aspects of utility operations,"[3] which underscores the need to ensure appropriate regulatory oversight. Petitioners thus propose that the recommended review require "each of the companies … to report all use of AI systems in their operations including but not limited to the functional

[1] Jurisdictional utilities that should be included within the Authority's review include, but are not limited to, (i) The Connecticut Light and Power Company d/b/a Eversource Energy and Yankee Gas Services Company d/b/a Eversource Energy (collectively, "Eversource"), and (ii) Connecticut Natural Gas Corporation, The Southern Connecticut Gas Company, and The United Illuminating Company (collectively, "Avangrid").

[2] Joint Petition at 2.

[3] Id. at 4.

objective of the system, the level of human oversight, and the policies, procedures, and protocols that govern the use of AI systems within their organizations."[4]

AI is a rapidly-developing technology that presents opportunities to improve utility operations and achieve efficiencies, but also creates new risks and costs. The cybersecurity landscape has changed dramatically in recent years with the proliferation of AI tools able to serve, as the Petitioners explain, as "both as a sword and a shield."[5] Bad actors have leveraged AI to increase the frequency and sophistication of attacks on utility systems, while AI also assists utilities with identifying and responding to these threats and vulnerabilities. The Authority should understand the implications of AI for data and cyber security, but its investigation should extend well beyond these topics to include customer service interactions, storm preparedness, AI-assisted drone inspections of critical energy infrastructure,[6] as well as all other utility applications of AI tools. Thus, it is critical that the Authority determine the full scope of utility AI usage in Connecticut and the associated costs to determine what, if any, additional regulatory mechanisms are necessary for it to oversee utility reliance on this new technology.

Accordingly, CIEC agrees with and fully supports the Joint Petition's request that the Authority initiate a comprehensive review of the Connecticut utilities' use of AI systems and the associated guidelines, practices, policies, and safeguards. CIEC submits that the inventory should include AI tools the Connecticut utilities already have embedded throughout their operations, as well as AI use cases and solutions they anticipate developing and/or deploying in the future. CIEC expects that, although the cost and nature of AI deployment in utility operations will be another focus of review in utility rate proceedings following the investigation advocated in the Joint Petition, an initial, statewide review is necessary for a comprehensive initial understanding of how utilities are utilizing AI systems.

The Authority should undertake the comprehensive investigation recommended by Petitioners and supported by CIEC, rather than the more narrow approach recommended by Eversource and Avangrid. In its response to the Joint Petition, Avangrid requests that the Authority rule that the Joint Petition is moot,[7] characterizing any investigation of the utilities' AI practices as duplicative of PURA's existing cybersecurity framework for public utilities.[8] Avangrid thus attempts to narrow the scope of the request to concerns regarding cybersecurity and dismiss those concerns as duplicative of other pending proceedings or processes. Its arguments are not compelling.

The investigation proposed in the Joint Petition and supported by CIEC would entail a comprehensive inventory and analysis of (i) how utilities are utilizing AI systems, (ii) opportunities

---

4 Id. at 5.

5 Joint Petition at 3.

6 Eversource, "SmartInspect," *available at* https://www.eversource.com/residential/about/our-company/investing-in-innovation/smart-inspect.

7 Docket No. 26-10-11, *Petition of the Office of the Attorney General and Office of Consumer Counsel for Review of AI, Data Security, and Cybersecurity*, Response of Avangrid to the Joint Petition of the Attorney General and Consumer Counsel (filed Oct. 23, 2026) at 1.

8 Docket No. 14-05-12, *PURA Cybersecurity Compliance Standards and Oversight Procedures*, Connecticut United Illuminating, Public Utilities Cybersecurity Action Plan (issued April 6, 2016).

the technology offers to improve operations and/or achieve efficiencies, (iii) risks associated with the use of this advanced technology, and (iv) costs associated with AI development, deployment, and utilization. The investigation would include, but not be limited to, data and cyber security. The Authority has broad jurisdictional authority over utility operations and there is little transparency now regarding AI systems that utilities are embedding throughout their businesses. Increasing reliance on AI systems presents risks and opportunities that may be materially different than those traditionally considered by the Authority. It thus is critical that the Authority understand the full scope of AI usage by its jurisdictional utilities so that it can determine what additional regulatory mechanisms – if any – may be needed to appropriately manage those tools.

Eversource similarly seems to suggest that the Authority's investigation should focus predominantly – although not exclusively – on data security and cybersecurity. Eversource argues that the Authority should apply to its investigation the same highly restrictive framework currently used for review of the Companies' cybersecurity practices, arguing "that a catalog of the Company's use of AI would provide hackers information that could be used to target those systems and specifically design attacks targeting AI use cases."[9]

CIEC agrees with Eversource that some portion of the information that should be produced during the investigation likely will be deemed confidential. Where appropriate given the sensitivity of specific information that may be produced, CIEC agrees that the Authority should adopt reasonable, tailored restrictions on access to and use of that information so as to protect it from public disclosure. It is imperative, however, that the Authority balance its need to protect confidential information with the transparency that also is necessary to enable meaningful stakeholder involvement in the proceeding and public policy that favors information to be disclosed unless there is a specific reason to prevent such disclosure. The Authority can determine as needed what information reasonably can be produced on a public record without redaction versus information that is sensitive and thus warrants redaction and protection from public disclosure. When balancing these interests, CIEC recommends that the Authority also consider whether such information has been previously disclosed through press releases, investor reports, academic articles, or regulatory filings.[10]

Finally, CIEC respectfully urges the Authority to commence the investigation quickly. Artificial intelligence technologies are advancing rapidly and they increasingly are being embedded in utility operations. It is important for the Authority to have a complete understanding of how those tools are being used to ensure that its oversight of jurisdictional utilities is adequate and appropriate.

---

[9] Docket No. 26-10-11, *supra*, Response of Eversource to the Joint Petition of the Attorney General and Consumer Counsel (filed October 23, 2026) at 4.

[10] Notably, the Companies and/or their affiliates have identified certain AI use cases publicly through voluntary press releases, which demonstrates that confidential treatment is not necessary for all AI-related information. *(See, e.g.*, United Illuminating, "UI Invests in Improvements to Customer Service, Adds New Features" (August 11, 2025), *available at* https://www.uinet.com/w/ui-invests-in-improvements-to-customer-service-adds-new-features?p_l_back_url=%2Fsearch%3Fq%3Dai&p_l_back_url_title=Search; New York State Electric and Gas, "NYSEG and RG&E Use Data to Combat Invasive Insect Killing Trees" (October 8, 2025), *available at* https://www.nyseg.com/w/nyseg-and-rg-e-use-data-to-combat-invasive-insect-killing-trees?p_l_back_url=%2Fsearch%3Fq%3Dai&p_l_back_url_title=Search; Eversource, "SmartInspect," *available at* https://www.eversource.com/residential/about/our-company/investing-in-innovation/smart-inspect.)

Conclusion

For the foregoing reasons, CIEC respectfully requests that the Authority grant the Joint Petition's request to initiate a comprehensive review of the Connecticut utilities' use of AI tools and costs, risks, and opportunities presented by those tools, consistent with the recommendations provided herein and in the Joint Petition.

Very truly yours,

CONNECTICUT INDUSTRIAL ENERGY CONSUMERS

S. Jay Goodman

S. Jay Goodman, Esq.