

**STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY**

JOINT PETITION OF WILLIAM TONG	:	DOCKET NO. 26-10-__
ATTORNEY GENERAL FOR THE	:	
STATE OF CONNECTICUT,	:	
AND CLAIRE E. COLEMAN,	:	
CONSUMER COUNSEL, FOR	:	
A REVIEW OF ARTIFICIAL	:	
INTELLIGENCE UTILIZATION,	:	
DATA SECURITY, AND	:	
CYBERSECURITY IN THE	:	
OPERATIONS OF PUBLIC UTILITIES	:	OCTOBER 13, 2026

**JOINT PETITION OF WILLIAM TONG, ATTORNEY GENERAL FOR THE STATE
OF CONNECTICUT, AND CLAIRE E. COLEMAN, CONSUMER COUNSEL, FOR A
REVIEW OF ARTIFICIAL INTELLIGENCE UTILIZATION, DATA SECURITY, AND
CYBERSECURITY IN THE OPERATIONS OF PUBLIC UTILITIES**

Pursuant to General Statutes §§ 16-11 and 16-19e, William Tong, Attorney General for the State of Connecticut (“Attorney General”) and Claire E. Coleman, Consumer Counsel, (collectively “State Parties”) respectfully request that the Public Utilities Regulatory Authority (“PURA” or “Authority”) initiate a proceeding to review the deployment of artificial intelligence (“AI”)¹ in the operations of Connecticut’s electric, gas, and water utilities.² This proceeding should also examine the data security and cybersecurity practices of the public service companies. AI and associated new technologies are rapidly transforming society, and it is critical for PURA, in partnership with the state and the public service companies, to review and

¹ Artificial Intelligence has a variety of definitions. Public Act 26-15 § 17 defines “artificial intelligence” as any machine-based system that, for any explicit or implicit objective, infers from the inputs such system receives how to generate outputs, including, but not limited to, content, decisions, predictions or recommendations, that can influence physical or virtual environments.

² The Connecticut Light and Power Company d/b/a Eversource Energy, Connecticut Natural Gas Corporation, Connecticut Water Company, Southern Connecticut Gas Company, The United Illuminating Company, and Yankee Gas Services Company d/b/a Eversource Energy. The State Parties would also support the Authority’s inclusion of the smaller water companies and understand their participation in the docket may be of a different scope than the larger companies.

establish best practices for AI and data security as part of its obligation to ensure that the utilities provide safe service in a manner consistent with the public interest. Conn. Gen. Stat. § 16-11.

The Attorney General and Consumer Counsel recognize that the scope of this proposed proceeding is extensive. The State Parties would support the Authority should it determine that this investigation be conducted through separate phases or dockets in a reasonable timeframe to address the challenges presented by AI, cybersecurity, and data security as interconnected but separate topics for consideration.³

I. BACKGROUND

Organizational adoption of AI has grown sharply, with 47 percent of U.S. employees now reporting that their organization has integrated AI tools.⁴ Public utilities are using AI across the country, and the rollout and internal policies vary from company to company.⁵ While Avangrid and Eversource have noted that the companies use AI in public statements and online, the extent and scope of AI use in Connecticut utility operations is unclear.⁶

In 2025, 72 percent of S&P 500 companies disclosed at least one material AI risk, which is up sharply from just 12 percent in 2023.⁷ A number of risks have been reported with the

³ The Attorney General and Consumer Counsel also recognize some of these issues are being evaluated during the review of Eversource's application to amend its rates in Docket No. 26-05-10. However, given the myriad issues being addressed in the rate proceeding, it still is important to conduct a general investigation and more detailed analysis of practices across all utilities operating in Connecticut.

⁴ *Organizational AI Adoption Jumps Six Points*, GALLUP (July 20, 2026), <https://www.gallup.com/workplace/712736/organizational-adoption-jumps-six-points.aspx>.

⁵ Chris McPhee, *How are public utilities actually using AI? We asked leaders from 18 utilities*, RAFTELIS (last visited Sept. 29, 2026), <https://www.raftelis.com/insight/how-are-public-utilities-actually-using-ai-we-asked-leaders-from-18-utilities>.

⁶ SmartInspect, EVERSOURCE, <https://www.eversource.com/residential/about/our-company/investing-in-innovation/smart-inspect> (last visited Sept. 30, 2026) (Eversource's website highlights the use of artificial intelligence algorithms to "streamline[] inspections of our thousands of miles of transmission and distribution lines."); James Darley, *How Avangrid is Implementing AI Across its Grid Operations*, Energy Digital (Sept. 21, 2026), <https://energydigital.com/news/how-avangrid-is-implementing-ai-across-its-grid-operations>.

⁷ Matteo Tonello, The Conference Board, Inc., *AI Risk Disclosures in the S&P 500: Reputation, Cybersecurity and Regulation*, HARVARD LAW SCHOOL FORUM ON CORPORATE Governance, (Oct. 15, 2025), <https://corpgov.law.harvard.edu/2025/10/15/ai-risk-disclosures-in-the-sp-500-reputation-cybersecurity-and-regulation/>.

technology, including false or misleading information, hallucinations, algorithmic biases, data privacy and security concerns, and inaccurate storm response predictions.⁸ Taking storm response as one example, a conventional weather model outperformed AI models in accurately predicting a Nor'easter that hit the northeast this past February.⁹ Another example of AI predictions gone awry took place in California where wildfires were ten times bigger than the utility's AI forecast.¹⁰

With respect to cybersecurity and data privacy, AI can be used both as a sword and a shield, to hack into systems as well as to help energy companies identify and patch vulnerabilities.¹¹ The number of cyber attacks per week per energy organization has been steadily increasing this decade.¹² While there are a variety of training systems and security frameworks available, the steps Connecticut utilities are taking to ensure systems are protected in the face of AI proliferation has not yet been comprehensively examined by the Authority.¹³

⁸ Artificial Intelligence Index Report 2026, Stamford University Human-Centered Artificial Intelligence https://hai.stanford.edu/assets/files/ai_index_report_2026.pdf; Kristin Burnham, *These are the most urgent AI risks, according to 272 experts*, MIT MANAGEMENT SLOAN SCHOOL (July 20, 2026), <https://mitsloan.mit.edu/ideas-made-to-matter/these-are-most-urgent-ai-risks-according-to-272-experts>; *A.I. Weather Models Fell Short in Predicting Northeastern Blizzard*, YaleEnvironment360, (Feb 25, 2026), <https://e360.yale.edu/digest/ai-weather-forecast-northeast-blizzard>.

⁹ *A.I. Weather Models Fell Short in Predicting Northeastern Blizzard*, YaleEnvironment360, (Feb 25, 2026), <https://e360.yale.edu/digest/ai-weather-forecast-northeast-blizzard>.

¹⁰ Tim McLaughlin and Laila Kearney, *Los Angeles wildfires were 10 times bigger than utilities forecast*, REUTERS, (June 9, 2025), <https://www.reuters.com/business/environment/los-angeles-wildfires-were-10-times-bigger-than-utilities-ai-forecast-2025-06-09/>.

¹¹ Eduardo Garcia, *Energy firms face AI-enhanced cyber attacks in connectivity*, REUTERS (Sept. 1, 2026), <https://www.reuters.com/business/energy/energy-firms-face-ai-enhanced-cyber-attacks-connectivity-push--reeii-2026-09-01/>.

¹² *Id.*

¹³ This is not to imply that the Authority is not cognizant of the fact that these matters merit investigation. The Authority previously opened Docket No. 26-04-06 for the purpose of investigating the cybersecurity practices of Connecticut's public service companies. That proceeding, however, was subsequently utilized for an investigation requested by the OCC into a specific data breach at the Eversource companies. The intersection of cybersecurity, data privacy, and AI use is a necessarily broader inquiry.

II. PURA HAS THE AUTHORITY AND OBLIGATION TO ENSURE THESE TECHNOLOGIES ARE IMPLEMENTED SAFELY

The Authority is statutorily charged with ensuring Connecticut’s investor-owned utilities provide safe, clean, reliable and affordable utility service and infrastructure. Conn. Gen. Stat. § 16-19e provides that “the Public Utilities Regulatory Authority shall examine and regulate . . . the operations and internal workings of public service companies and the establishment of the level and structure of rates in accordance with the following principles . . . that the authority and all public service companies shall perform all of their respective public responsibilities with economy, efficiency and care for public safety and energy security. . .” Conn. Gen. Stat. § 16-11 further provides that:

The general purposes of this section and sections 16-19, 16-25, 16-43 and 16-47 are to assure to the state of Connecticut its full powers to regulate its public service companies, to increase the powers of the Public Utilities Regulatory Authority and to promote local control of the public service companies of this state, and said sections shall be so construed as to effectuate these purposes.

This past summer, the legislature enacted Public Act 26-15, the Connecticut Artificial Intelligence Responsibility and Transparency Act (the “CART Act”). While the CART Act does address certain guardrails around employment practices,¹⁴ it does not put other guardrails or restrictions on AI use for public utilities.

III. IMPACT ON CONNECTICUT AND SCOPE

AI, data security, and cybersecurity have the capacity to touch all aspects of utility operations. This proceeding would provide an opportunity to look into what the utilities have been doing, compare current operations to industry standards, and identify which areas are

¹⁴ Public Act 26-15 §§ 9-10, <https://www.cga.ct.gov/2026/ACT/PA/PDF/2026PA-00015-R00SB-00005-PA.PDF> (noting certain employment disclosure requirements when a company uses AI to inform certain employment decisions).

meeting standards and which areas need refinement. Other state public utility commissions have opened formal inquiries into the use of AI by the public utilities in their states.¹⁵

The Attorney General and Consumer Counsel therefore recommend that the scope of the inquiry should include, but not be limited to the following topic areas:

- Storm response;
- Customer systems;
- Asset management;
- Planning and forecasting of energy load and water demands;
- Procurement of electric, natural gas, and water resources equipment;
- Grid, power plants and water distribution and treatment systems operations and maintenance;
- Third party vendors; and
- AMI.

In addition to the inquiry of these topic areas, each of the companies should be required to report all use of AI systems in their operations including but not limited to the functional 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.

The Authority should also include in its investigation an inquiry into data security and cybersecurity protections and breaches, both stemming from AI and outside of AI. This inquiry should include which entities and customer groups are informed about data breaches, whether the utilities follow what is required by Conn. Gen. Stat. § 36a-701b in reporting breaches, whether the utilities go beyond what is required by Connecticut’s statute in reporting breaches, and

¹⁵ See Nicole Garcia, *Commissioner Lea Márquez Peterson Opens Formal Inquiry into Potential Use of Artificial Intelligence in Utilities’ Operations* (Mar. 27, 2026), <https://azcc.gov/news/home/2026/03/27/commissioner-lea-m%C3%A1rquez-peterson-opens-formal-inquiry-into-potential-use-of-artificial-intelligence-in-utilities--operations>. (Arizona Corporation Commission opening a formal inquiry into the use and potential future uses of AI by public utilities); Robert Walton, *New York audits utility AI use, cites risk in ‘growing dependency’*, Utility Dive, (Sept. 24, 2026) https://www.utilitydive.com/news/new-york-audits-utility-ai-use-cites-risk-in-growing-dependency/831242/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue:%202026-09-24%20Utility%20Dive%20Newsletter%20%5Bissue:89565%5D&utm_term=Utility%20Dive (detailing the New York Public Utility Commission’s launching an inquiry into public utility use of artificial intelligence and order which requires electric, gas, and water utilities to respond within 60 days with “a written inventory report that describes all use cases of AI systems in their operations”).

whether the utility conducts a review after each data breach or cybersecurity breach to evaluate its policies and practices.

WHEREFORE, for the foregoing reasons, the Attorney General and Consumer Counsel respectfully request that the Authority open a proceeding or proceedings to review both the deployment of artificial intelligence in the operations of Connecticut's public service companies as well as their data security and cybersecurity practices to ensure the utilities provide safe and reliable service to the public.

Respectfully Submitted,

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