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THE UNITED ILLUMINATING COMPANY'S	:	DOCKET NO. _____
APPLICATION FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND PUBLIC	:	
NEED FOR A NEW 115/13.8 KILOVOLT SUBSTATION:	:	
AT 14 OLD STRATFORD ROAD, SHELTON, CT	:	OCTOBER 3, 2012

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**MOTION OF THE UNITED ILLUMINATING COMPANY  
FOR PROTECTIVE ORDER AND MEMORANDUM IN SUPPORT**

The United Illuminating Company (“UI” or the “Company”) has filed contemporaneously herewith an Application for a Certificate of Environmental Compatibility and Public Need for the construction and operation of a new 115/13.8 kilovolt (kV) substation on a portion of a six-acre property at 14 Old Stratford Road in the City of Shelton, Fairfield County (the “Application”). The Company hereby moves that the Connecticut Siting Council (“Council”) enter a protective order in this proceeding (“Protective Order”) to ensure that confidential information provided to the Council on this day is not subject to public disclosure. For the reasons set forth in the Affidavit of Adam O’Laughlin, dated September 28, 2012, UI asks that the protective order specifically include the information contained in the Company’s Appendix I EMF Analysis (Exponent Report) (“Appendix I”).

Appendix I contains Critical Energy Infrastructure Information (“CEII”) as defined by the Federal Energy Regulatory Commission (“FERC”).<sup>1</sup> The FERC requires specific

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<sup>1</sup> 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

procedures for the handling of CEII, including established marking requirements as well as ensuring that any sharing of CEII is for a legitimate purpose and done in such a manner to ensure that CEII is not placed in the public domain. Public disclosure of CEII would be contrary to standards established by FERC that are aimed at protecting the security, public health and safety, and the economic security of the United States. Accordingly, the Company seeks confidential treatment for the above-mentioned attachment. The Company also asks that recipients of such CEII be required to abide by existing best practices for maintaining the security of CEII.<sup>2</sup>

For the above reasons, UI respectfully moves that the Council grant the Company's Motion for Protective Order.


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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.”

<sup>2</sup> For example, (i) recipients of CEII may only discuss CEII with another recipient of the identical CEII, (ii) recipients of CEII may use CEII as foundation advice provided to others but may not disclose CEII to another individual unless that individual is an approved CEE recipient of the same CEII, (iii) recipients of CEII will not use it for an illegal or non-legitimate purpose, and (iv) the CEII is to be maintained in a secure place with access limited to CEEI recipient of the identical material.

Respectfully submitted,

**THE UNITED ILLUMINATING COMPANY**

By: 

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