

STATE OF CONNECTICUT

SITING COUNCIL

The Connecticut Light & Power Company Application for a Certificate of Environmental Compatibility and Public Need for the Stamford Reliability Cable Project, which consists of construction, maintenance, and operation of a new 115-kV underground transmission circuit extending approximately 1.5 miles between Glenbrook and South End Substations, Stamford, Connecticut and related substation improvements.	DOCKET NO. 435
	January 28, 2013

**MOTION OF THE CONNECTICUT LIGHT AND POWER COMPANY
FOR A PROTECTIVE ORDER WITH RESPECT TO THE “CEII APPENDIX”
TO THE ABOVE CAPTIONED APPLICATION**

The Connecticut Light and Power Company (“CL&P”) hereby moves that the Connecticut Siting Council (“Council”) enter a protective order in this docket to ensure that certain critical energy infrastructure information (“CEII”) provided to the Council is not subject to unrestricted, general public disclosure. Specifically, for the reasons set forth in the attached Memorandum of Law in Support of Motion for Protective Order (the “Memorandum”), and the Affidavit of Allen W. Scarfone filed this day with the Council, CL&P asks that this protective order apply to the “CEII Appendix” to the Application in the above captioned Docket, which consists of a detailed analysis of the need for the project.

The CEII Appendix has been filed contemporaneously with this motion, in a sealed and properly labeled envelope.

CL&P further requests that such order apply to such other CEII as CL&P may be required to file in this Docket.

CL&P seeks to protect information contained in the CEII Appendix and such other CEII as may later be filed from unrestricted disclosure to the public because it identifies specific existing weaknesses and vulnerabilities of the transmission systems of Southern New England.

As explained more fully in the accompanying Memorandum, information in the CEII Appendix is required to be accorded confidential treatment by the policies of the Federal Energy Regulatory Commission, as stated in its Order 890, issued February 16, 2007; and by policies of the Independent System Operator, New England and CL&P. The information is exempt from disclosure under the Connecticut Freedom of Information Act, Conn. Gen. Stats. Sec.1-200 et seq., because disclosure of the information may result in a risk of harm to a facility owned by a public service company.

CL&P asks that disclosure of the CEII under the protective order be limited and that parties and intervenors who are not otherwise entitled to have access to the information who wish to review it be required to execute an application and non-disclosure agreement, the forms of which are attached to the proposed protective order filed herewith.

Respectfully submitted,

**THE CONNECTICUT LIGHT AND POWER
COMPANY**

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