

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

**KCE CT 9, LLC Petition For A Declaratory Ruling, Pursuant To Connecticut General Statutes §4-176 And §16-50k, for the Proposed Construction, Maintenance And Operation of a 5.0-Megawatt AC Battery Energy Storage Facility Located at 2 Ella T. Grasso Turnpike, Windsor Locks, Connecticut and Associated Electrical Interconnection.**

**Docket No. 1579**

**August 4, 2023**

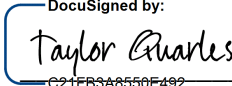
**AFFIDAVIT OF TAYLOR QUARLES**

I, Taylor Quarles, do state and declare under penalty of perjury as follows:

1. I am over the age of eighteen and understand the obligation of an oath.
2. I submit this Affidavit in support of the Request for Protective Order as it relates to confidential information which shall be provided by KCE CT 9, LLC (“KCE”) in response to the Connecticut Siting Council’s (“Council”) request for interrogatories within the above-referenced docket.
3. I am employed by KCE as the Authorized Representative. In that position, I have ultimate responsibility for all aspects of the project that is the subject of this docket.
4. I have personal knowledge of the facts set forth herein unless otherwise stated, in which case, I understand those facts to be true based on information and belief.
5. Specifically, KCE seeks to protect from public disclosure non-public information regarding the project’s costs, cost recovery mechanisms, and energy pricing. (the “Confidential Information”).
6. The Confidential Information is used by KCE for competitive bidding, internal planning and business purposes. The Confidential Information contains cost and price information related to KCE’s project, that is critical, commercially sensitive, and competitively significant.
7. The Confidential Information constitutes commercial or financial information given in confidence and is exempt from disclosure under both state and federal law. *See*, 5 U.S.C. §552; Conn. Gen. Stat. §1-210(5)(B).
8. Public disclosure would harm KCE’s ability to compete in this very competitive emerging energy storage market. As such, KCE considers this information to be trade secrets and protects this information from public disclosure. *See*, 5 U.S.C. §552; Conn. Gen. Stat. §1-210(5)(A).
9. To the best of my knowledge, no agency of the state of Connecticut, nor any other state of federal agency or court of competent jurisdiction, has previously made a confidentiality determination relevant to the Confidential Information.

IN WITNESS WHEREOF, the undersigned has executed and delivered this Affidavit as of the date set forth above.

**KCE CT 9, LLC,**

By:  DocuSigned by:  
Taylor Quarles  
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Name: Taylor Quarles  
Title: Authorized Representative  
8/7/2023