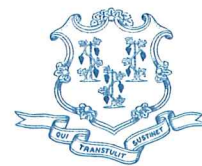


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FREEDOM OF INFORMATION

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Connecticut Light & Power Co.
Complainant(s)
against

Notice of Meeting

Docket #FIC 2025-0816

Marissa Paslick Gillett, Chairman, State of Connecticut,
Public Utilities Regulatory Authority; and State of
Connecticut, Public Utilities Regulatory Authority
Respondent(s)

September 1, 2026

Transmittal of Proposed Final Decision

In accordance with Section 4-179 of the Connecticut General Statutes, the Freedom of Information Commission hereby transmits to you the proposed finding and decision prepared by the hearing officer in the above-captioned matter.

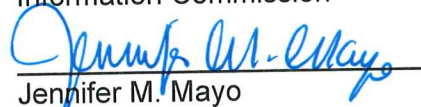
This will notify you that the Commission will consider this matter for disposition at its meeting which will be held **in person** at the Freedom of Information Commission's Hearing Room, Conference Room H, located on the ground floor at 165 Capitol Avenue, Hartford, Connecticut, at **2:00 p.m. on Wednesday, September 9, 2026.**

At that time and place, you will be allowed to offer oral argument concerning this proposed finding and order in person. Oral argument shall be limited to ten (10) minutes. For good cause shown, however, the Commission may increase the period of time for argument. A request for additional time must be made in writing and should be filed with the Commission **ON OR BEFORE September 8, 2026.** Such request **MUST BE (1) copied to all parties, or if the parties are represented, to such representatives, and (2) include a notation indicating such notice to all parties or their representatives.**

Although a brief or memorandum of law is not required, if you decide to submit such a document, an **original and fourteen (14) copies** must be filed **ON OR BEFORE September 8, 2026.** PLEASE NOTE: Any correspondence, brief or memorandum directed to the Commissioners by any party or representative of any party **MUST BE (1) copied to all parties, or if the parties are represented, to such representatives, (2) include a notation indicating such notice to all parties or their representatives and (3) be limited to argument.** NO NEW EVIDENCE MAY BE SUBMITTED.

If you have already filed a brief or memorandum with the hearing officer and wish to have that document distributed to each member of the Commission, it is requested that **fifteen (15) copies** be filed **ON OR BEFORE September 8, 2026** and that **notice be given to all parties or if the parties are represented, to their representatives, that such previously filed document is being submitted to the Commissioners for review.**

By Order of the Freedom of
Information Commission



Jennifer M. Mayo
Acting Clerk of the Commission

Notice to: Attorney James J. Healy
Attorney Thomas J. Murphy
Assistant Attorney General James B. Zimmer

FIC# 2025-0816/ITRA/MKS/CZH/JMM/2026-09-1

FREEDOM OF INFORMATION COMMISSION
OF THE STATE OF CONNECTICUT

In the Matter of a Complaint by

Report of Hearing Officer

Connecticut Light & Power Co.;
Yankee Gas Services Company; Aquarion
Water Company of Connecticut; and
UIL Holdings Corporation,¹

Complainants

against

Docket # FIC 2025-0816

Marissa Paslick Gillett, Chairman, State of
Connecticut, Public Utilities Regulatory
Authority; and State of Connecticut, Public
Utilities Regulatory Authority,

Respondents

September 1, 2026

The above-captioned matter was heard as a contested case on April 16, 2026, at which time the complainants and the respondents appeared, stipulated to certain facts, and presented testimony, exhibits and argument on the complaint.

After consideration of the entire record, the following facts are found and conclusions of law are reached:

1. The respondents are public agencies within the meaning of §1-200(1), G.S.
2. It is found that, by email and letter dated May 27, 2025, the complainants requested that the respondents provide them with copies of the following records:

All emails, correspondence, text messages, social media messages, voicemail messages, or other documentation of any kind of any communications dated, created, sent, received, delivered, or preserved at any time between May 1, 2025 and May 27, 2025, related in any way to any draft, potential, and/or proposed legislation.

For the avoidance of all doubt, this FOIA request seeks any such communications described above whether transmitted or exchanged only internally among [State of Connecticut, Public

¹ The caption has been amended to reflect all of the complainants identified in the complaint.

Utilities Regulatory Authority ("PURA") personnel or if transmitted or exchanged to anyone outside PURA.

For the further avoidance of all doubt, this FOIA request seeks any such communications described above related to draft, potential, and/or proposed legislation being considered by either or both houses of the Connecticut General Assembly, to include communications with staff of either of those legislative bodies. For the further avoidance of all doubt, this FOIA request seeks any such communications described above related to Senate Bill No. 4 ("SB4").

For the further avoidance of all doubt, this FOIA request seeks any such communications described above related to any proposal to amend the current version of Connecticut General Statutes § 16-2.

For the further avoidance of all doubt, this FOIA request seeks any such communications described above created or maintained on any personal telephones or computers.

For the further avoidance of all doubt, this FOIA request also seeks all attachments to any such communications responsive to this FOIA request.

("May 27, 2025 request").

3. It is found that, by email dated July 11, 2025, the respondents acknowledged the May 27, 2025 request, and informed the complainants that it might take several weeks to conduct a search, review any responsive records, and to provide responsive records to the complainants.

4. It is found that, by email dated August 7, 2025, the respondents followed up with the complainants, stating the following:

The Authority is continuing to collect and review documents responsive to your request. Because the documents relate to communications on draft legislation with other agencies, the Office of the Governor, and the General Assembly, the Office of the Attorney General is reviewing the documents to determine if exemptions under FOIA may be applicable. This review is ongoing. Given the volume of documents, the review should be completed in a few weeks.

5. It is found that, on August 7, 2025, the respondents sent a separate email to the complainants, stating the following:

PURA has conducted a review of its records including Outlook, Teams, SharePoint files, and mobile devices.

Due to the broad nature of the request, PURA also requested that [State of Connecticut, Department of Energy and Environmental Protection (“DEEP”)] IT conduct an IT search of email and Teams communications of Marissa Gillett, Theresa Govert, and Taren O'Connor using the following search parameters for the period of May 1 to May 27, 2025:

SB4

S.B.4

SB-4

Senate Bill 4

Energy Affordability, Access and Accountability

Energy Affordability

Energy Access

Energy Accountability

16-2

Bill

Legislation

@cga.ct.gov

These searches identified approximately 2,000 potentially responsive documents totaling about 13,000 pages. Over the past few weeks, the potentially responsive documents have been reviewed and approximately 400 responsive documents, totaling 5,200 pages, have been identified. PURA is currently reviewing these responsive documents to determine if any exemptions to disclosure are applicable.

PURA anticipates producing responsive documents on a rolling basis over the next few weeks.

Please note that the agency is experiencing an extremely high volume of work presently and is allocating its resources to comport with its statutory obligations.

6. It is found that, by email dated August 27, 2025, the respondents informed the complainants as follows:

As noted in the August 15, 2025 correspondence, the Authority identified approximately 400 responsive documents, totaling 5,200 pages out of the original 2,000 potentially responsive documents totaling about 13,000 pages initially identified through an IT search.

The Authority is currently in the process of reviewing the responsive documents for exemptions to disclosure permitted under FOIA. The Authority will be redacting information covered by attorney-client privilege and other exemptions, including the

exemption for preliminary drafts or notes.

The first production of documents (543 pages) was posted on 8/20/25 with notice sent on 8/21/25.

The second and third productions (602 and 2,997 pages respectively) were uploaded to the GovQA platform on 8/27/25 and will be released by DEEP² shortly.

This brings the current rolling production to approximately 4,100 pages. The Authority anticipates reviewing and producing the remaining 1,100 pages of document[s] within the next week or so.

7. It is found that, by emails dated August 29, 2025 and September 5, 2025, the respondents provided the complainants with email links to additional responsive records.

8. By letter dated and filed September 11, 2025, the complainants appealed to this Commission, alleging that the respondents violated the Freedom of Information (“FOI”) Act by failing to provide them with copies of all of the records described in the May 27, 2025 request. The complainants also requested that the Commission consider the imposition of a civil penalty under §1-206(b)(2), G.S.³

9. Section 1-200(5), G.S., provides:

"Public records or files" means any recorded data or information relating to the conduct of the public's business prepared, owned, used, received or retained by a public agency, or to which a public agency is entitled to receive a copy by law or contract under section 1-218, whether such data or information be handwritten, typed, tape-recorded, videotaped, printed, photostated, photographed or recorded by any other method.

10. Section 1-210(a), G.S., provides, in relevant part:

Except as otherwise provided by any federal law or state statute, all records maintained or kept on file by any public agency, whether or not such records are required by any law or by any rule or regulation, shall be public records and every person shall have the right to . . . (3) receive a copy of such records in accordance with the provisions of section 1-212.

² During the hearing on this matter, the Legal Director for PURA testified, and it is found, that although DEEP provided certain administrative assistance to the respondents, including but not limited to administering the GovQA system for PURA, DEEP is a separate public agency from PURA.

³ Although the complaint described in paragraph 8, above, appears to include an allegation that the respondents violated the promptness provisions of the FOI Act, the complainants withdrew any such claim during the hearing on this matter.

11. Section 1-212(a), G.S., provides in relevant part: “Any person applying in writing shall receive, promptly upon request, a plain, facsimile, electronic or certified copy of any public record.”

12. It is concluded that the records described in the May 27, 2025 request are public records within the meaning of §§1-200(5) and 1-210(a), G.S.

13. It is found that the respondents provided the complainants with approximately 5,200 pages of responsive records, portions of which were redacted. It is further found that on December 15, 2025, the respondents provided the complainants with an unredacted copy of twenty-eight pages of records which were comprised of an email and an attachment dated May 12, 2025.

14. During the hearing on this matter, and on brief, the complainants challenged redactions to the records that were provided to the complainants. They contended further that the respondents provided nothing more than conclusory language, generalized allegations or mere arguments of counsel to support their claims of exemption. In addition, the complainants claimed that the withheld or redacted records, or portions thereof, that reflect proposed changes to legislation that were sent to other public agencies, separate from PURA, including to legislators, are not exempt pursuant to §1-210(b)(1), G.S. and were required to be disclosed pursuant to §1-210(e)(1), G.S. The complainants also contested the respondents’ claim that the public interest in withholding the records clearly outweighed the public interest in disclosure pursuant to §1-210(b)(1), G.S.

15. At the hearing on the matter, and in their post-hearing briefs, the complainants also challenged the adequacy of the respondents’ search for records.

16. At the hearing on this matter, and on brief, the respondents contended that they conducted a sufficient search for records and disclosed to the complainants all records maintained by the respondents that were responsive to the May 27, 2025 request, with the exception of those records, or portions thereof, that they considered exempt from disclosure pursuant to §§1-210(b)(1), and 1-210(b)(10), G.S. The respondents claimed that the vast majority of withheld and redacted records were preliminary notes and drafts within the meaning of §1-210(b)(1), G.S., and the fact that the records were shared between agencies is immaterial.

Adequacy of the Respondents’ Search

17. In their complaint and at the hearing on this matter, the complainants alleged that the respondents had not conducted a diligent and thorough search for all records responsive to the May 27, 2025 request.

18. Prior to the hearing on this matter, the complainants served subpoenas on Scott Muska, the Legal Director for PURA (“Legal Director”); Jeffrey R. Gaudiosi, the Executive Secretary of PURA (“Executive Secretary”); Theresa Govert, who had served as the Chief of Staff for PURA during all times relevant to the May 27, 2025 request (“Chief of Staff”); and Taren O’Connor, the Director of Legislation, Regulations and Communications of PURA (“Director of Legislation”). Such individuals all testified, to varying degrees, as to the search for

records responsive to the May 27, 2025 request, among other topics.

19. It is found that the Legal Director managed the search for records responsive to the May 27, 2025 request.

20. The Legal Director testified, and it is found, that he sent an email, on July 1, 2025, to three individuals at PURA, whom he claimed were the only individuals involved in legislative affairs at PURA, besides himself, which included: the Chair, the Chief of Staff, and the Director of Legislation. It is found that such July 1, 2025 email stated as follows:

PURA received a FOIA request related to "draft, potential, and/or proposed legislation."

All emails, correspondence, text messages, social media messages, voicemail messages, or other documentation of any kind of any communications dated, created, sent, received, delivered, or preserved at any time between May 1, 2025 and May 27, 2025, related in any way to any draft, potential; and/or proposed legislation.

Initially, I have segregated the files into two categories: 1) SB4 and legislation related to 16-2, and 2) other legislation.

Over the next week or so, please identify any emails or documents (& text messages etc.) related to these categories (note the limited time period). The documents can be placed in the folder linked at Murphy (May 27).

Let me know if you have any questions.

21. In addition, it is found that the Legal Director requested that the Connecticut Department of Administrative Services Bureau of Information Technology Solutions ("BITS") conduct an electronic search for records responsive to the May 27, 2025 request.

22. It is found that BITS conducted a search of PURA's Outlook, Teams, and SharePoint files, that the responsive records were provided to PURA and that the Legal Director as well as certain attorneys employed by the Office of Attorney General for the State of Connecticut ("OAG") assisted in the review of the responsive records. However, the administrative record lacks adequate evidence that text messages on State issued cell phones, personal cell phones, personal social media accounts, or other personal methods of communication were searched.

23. The Commission takes administrative notice of the Memorandum of Decision issued in *The Connecticut Natural Gas Corporation v. Public Utilities Regulatory Authority*, Docket No. HHB-CV-25-6092047-S (Conn. Super. Ct. Nov. 19, 2025) and *The Southern Connecticut Gas Company v. Public Utilities Regulatory Authority*, Docket No. HHB-CV-25-6092047-S (Conn. Super. Ct. Nov. 19, 2025), where it was found that the Chair and the Chief of Staff had activated the auto-delete functions on their personal iPhones, thereby deleting certain text

messages, and any other public records located on such devices.

24. It is found that the Legal Director, in his July 1, 2025 email, described in paragraph 20, above, did not specifically instruct staff to search their personal devices, personal email accounts or social media accounts for records responsive to the May 27, 2025 request. It is found that such decision, considering the events described in paragraph 23, above, was not reasonable.

25. In addition, it is found that the respondents failed to provide sufficient evidence regarding the scope of the Chair's search for records and whether she searched her personal devices, her social media, or her personal email account(s) for responsive records. In addition, the Director of Legislation testified at the hearing on this matter, and it is found, that she did not recall being asked to search her personal devices.

26. During the hearing on this matter, the complainants questioned the Legal Director about whether PURA staff members had ever used Google Docs⁴ to communicate with legislators or others concerning proposed legislation. It is found that the respondents' witnesses acknowledged that they learned about such potential use of Google Docs through communications with attorneys at the OAG.

27. Based upon the respondents' testimony, it is found that PURA does not officially provide its staff with Google Docs accounts or access to Google Docs. It is found that, if a PURA staff member had used Google Docs it would have been through the use of their own individual password and account, not one administered or authorized by PURA. Nevertheless, it is found that nothing in the administrative record demonstrates that the respondents required PURA employees, staff or commissioners to search personal Google Docs accounts or to provide the complainants with any such responsive Google Docs records.

28. It is found that the Legal Director's July 1, 2025 email to the Chair, the Chief of Staff, and the Director of Legislation, described in paragraph 20, above, was insufficient to ensure that all the records responsive to the May 27, 2025 request were located. Moreover, to the extent that the respondents were conducting the public's business through the use of Google Docs, such records are public records and the respondents are required to attempt to retrieve any such records that might be responsive to the complainants' May 27, 2025 request.

29. Accordingly, it is found that the respondents failed to prove that they conducted a diligent and thorough search and provided the complainants with a copy of all responsive records.

30. It is concluded, therefore, that the respondents violated the disclosure provisions of §§1-210(a) and 1-212(a), G.S.

⁴ The Commission takes administrative notice of the Wikipedia definition of Google Docs located at <https://en.wikipedia.org/wiki/Google>, which states "Google Docs is an online word processor and part of the free, web-based Google Docs Editors suite offered by Google. Google Docs is accessible via a web browser as a web-based application and is also available as a mobile app on Android and iOS and as a desktop application on Google's ChromeOS."

Exemptions

31. On June 1, 2026, the respondents submitted an unredacted copy of the withheld records along with an Index to Records Submitted for In Camera Inspection (“Index”). On July 30, 2026, the respondents submitted a revised Index and an additional record for in camera review. Such records will be described herein as 2025-0816-1 through 2025-0816-4777 and 2025-0816-Supplemental Record.

32. On the Index, the respondents claimed that the majority of the records, or portions thereof, were exempt from disclosure pursuant to §1-210(b)(1), G.S., and that the following records or portions thereof were exempt pursuant to §1-210(b)(10), G.S.: 2025-0816-97, L. 27-53; 2025-0816-98, L. 1-4, 17-29, 55-56⁵; 2025-0816-160, L. 10-14, 30;⁶ 2025-0816-204, L. 11-42, 55-56; 2025-0816-205, L. 1-10; 2025-0816-287, L. 10-21; 2025-0816-304, L. 24-27; 2025-0816-305, L. 2, 18-28; 2025-0816-361, L. 11-23, 44-47; 2025-0816-392, L. 12; 2025-0816-432, L. 12-21; 2025-0816-493, L. 12-24, 39-45; 2025-0816-494, L. 9-29, 59; 2025-0816-495, L. 1-5, 42-57; 2025-0816-496, L. 1-37; 2025-0816-497, L. 23-24, 48-49; 2025-0816-497 to IC-2025-0816-498 (redacted chart); and 2025-0816-1639 (Attorney Muska Comments at Lines 49-61).⁷

Attorney-Client Privilege (§1-210(b)(10), G.S.)

33. With respect to the records that the respondents claim are exempt from disclosure pursuant to the attorney-client privilege, §1-210(b)(10), G.S., provides that disclosure is not required of “communications privileged by the attorney-client relationship.” The applicability of the exemption contained in §1-210(b)(10), G.S., is governed by established Connecticut law as set forth in *Maxwell v. Freedom of Info. Comm’n*, 260 Conn. 143 (2002). In that case, the Supreme Court stated that §52-146r, G.S., which established a statutory privilege for communications between public agencies and their attorneys, merely codifies “the common-law attorney-client privilege as [the] court previously had defined it.” *Id.* at 149.

34. Section 52-146r(2), G.S., defines “confidential communications” as follows:

All oral and written communication transmitted in confidence between a public official or employee of a public agency acting in the performance of his or her duties or within the scope of his or her employment and a government attorney relating to legal advice sought by the public agency or a public official or employee of such public agency from that attorney, and all records prepared by the government attorney in furtherance of the rendition of such

⁵ Portions of the records that were redacted are referred to by line number, which is designated by “L”.

⁶ On the Index, the respondents list P. 160, lines 10-14, and 50 as covered by the attorney-client privilege and, thus, exempt from disclosure under §1-210(b)(10), G.S. However, it is clear from the face of the records and the highlights made to the in camera record, that inclusion of line 50 was a typographical error, and that the respondents intended to claim P. 160, lines 10 -14 and 30 as exempt from disclosure under §1-210(b)(10), G.S.

⁷ With respect to 2025-0816-6 through 2025-0816-10 and 2025-0816-20 through 2025-0816-24 within the in camera records, the respondents indicated on the Index that the “highlights show unintentional redactions.” Based on the respondents’ contention that the redactions made to such records were unintentional, the respondents should provide the complainants with unredacted copies of such records if they have not done so already. Such records will not be further addressed herein.

legal advice....

35. Our Supreme Court has stated that a four-part test must be applied to determine whether communications are privileged: “(1) the attorney must be acting in a professional capacity for the agency; (2) the communications must be made to the attorney by current employees or officials of the agency; (3) the communications must relate to the legal advice sought by the agency from the attorney; and (4) the communications must be made in confidence.” *Lash v. Freedom of Info. Comm’n*, 300 Conn. 511, 516 (2011) (“*Lash*”), citing *Shew v. Freedom of Info. Comm’n*, 245 Conn. 149, 159 (1998) (“*Shew*”). “The burden of establishing the applicability of the privilege rests with the party invoking it.” *Harrington v. Freedom of Info. Comm’n*, 323 Conn. 1, 12 (2016) (“*Harrington*”). If it is clear from the face of the records, extrinsic evidence is not required to prove the existence of the attorney-client privilege.” *Lash*, 300 Conn. at 516-17.

36. Moreover, in Connecticut, “the attorney-client privilege protects both the confidential giving of professional advice by an attorney acting in the capacity of a legal advisor to those who can act on it, as well as the giving of information to the lawyer to enable counsel to give sound and informed advice....The privilege fosters full and frank communications between attorneys and their clients and thereby promote[s] the broader public interests in the observation of law and [the] administration of justice.” *PSE Consulting, Inc. v. Frank Mercede & Sons, Inc.*, 267 Conn. 279, 329-30 (2004).

37. In addition, it is well established that, generally, disclosure of an attorney-client privileged communication to a third party waives the privilege. *See, e.g., Harp v. King*, 266 Conn. 747, 767 (2003). However, “the presence of certain third parties...who are agents or employees of an attorney or client, and who are necessary to the [legal] consultation, will not destroy the confidential nature of the communication.” *Harrington*, 323 Conn. at 25 (citations omitted).

38. Based upon careful inspection of the following in camera records: 2025-0816-97, L. 27-53; 2025-0816-98, L. 1-4, 17-29, 55-56; 2025-0816-160, L. 10-14, 30; 2025-0816-204, L. 11-42, 55-56; 2025-0816-205, L. 1-10; 2025-0816-287, L. 10-21; 2025-0816-304, L. 24-27; 2025-0816-305, L. 2, 18-28; 2025-0816-361, L. 11-23, 44-47; 2025-0816-392, L. 12; 2025-0816-432, L. 12-21; 2025-0816-493, L. 12-24, 39-45; 2025-0816-494, L. 9-29, 59; 2025-0816-495, L. 1-5, 42-57; 2025-0816-496, L. 1-37; 2025-0816-497, L. 23-24, 48-49; 2025-0816-497 to IC-2025-0816-498 (redacted chart); and 2025-0816-1639 (Attorney Muska Comments at Lines 49-61), and in light of the evidence submitted at the hearing on this matter, it is found that such records, or portions thereof, satisfy the four-part test articulated by the Supreme Court in *Shew*. It is further found that such records, or portions thereof, contain the legal advice that the respondents sought and/or received from their attorneys. It is further found that the respondents were acting within the scope of their duties with regard to current agency business when they sought and/or received this advice. It is also found that the communications were made in confidence. It is further found that the respondents did not waive their attorney-client privilege. Accordingly, it is concluded that the respondents did not violate the FOI Act when they denied

the complainants unredacted copies of such records.⁸

§1-210(b)(1), G.S.

39. With respect to the respondents' claim that the in camera records, or portions thereof, are exempt from disclosure pursuant to §1-210(b)(1), G.S., such section provides that disclosure is not required of "preliminary drafts or notes provided the public agency has determined that the public interest in withholding such documents clearly outweighs the public interest in disclosure."

40. The Connecticut Supreme Court ruled in *Wilson v. Freedom of Info. Comm'n*, 181 Conn. 324, 332 (1980) ("*Wilson*"), that "the term 'preliminary drafts or notes' relates to advisory opinions, recommendations, and deliberations comprising part of the process by which government decisions and policies are formulated. . . ."

41. In *Wilson*, the court addressed whether recommendations from members of a program review committee ("PRC") established by the University of Connecticut that were made to the vice president of academic affairs were required to be disclosed under §1-210(b)(1), G.S. The function of the PRC was to review the operations of the academic departments and to make recommendations aimed at improving efficiency in those departments. *Wilson*, at 326. Both the Commission and the trial court concluded that the PRC documents were not preliminary drafts or notes based "on the fact that the documents in question are final drafts as far as the PRC is concerned, not subject to alteration; they [were] separate, distinct and completed documents in and of themselves." *Id.*, at 330–31.

42. The Supreme Court, in *Wilson*, disagreed with the Commission and the trial court and held that:

[preliminary notes and drafts described in 1-210(b)(1)] are predecisional. They do not in and of themselves affect agency policy, structure or function. They do not require particular conduct or forbearance on the part of the public. Instead, preliminary drafts or notes reflect that aspect of the agency's function that precedes formal and informed [decision-making]. We believe that the legislature sought to protect the free and candid exchange of ideas, the uninhibited proposition and criticism of options that often precedes, and usually improves the quality of, governmental decisions. It is records of this preliminary, deliberative and predecisional process that we conclude the exemption was meant to encompass.

Wilson, at 332–33.

43. With regard to the "balancing test" required by §1-210(b)(1), G.S., it is well

⁸ The complainants take issue with the fact that the respondents did not provide the complainants with a "privilege log" in response to their May 27, 2025 request. The Commission notes that nothing in the FOI Act requires public agencies to provide requestors with privilege logs.

established that the responsibility for making the determination as to what is in the public interest rests with the agency that maintains the records. *See Van Norstrand v. Freedom of Info. Comm'n*, 211 Conn. 339, 345 (1989). The agency must indicate the reasons for its determination, and those reasons may not be frivolous or patently unfounded. *Id.*, citing *Wilson*, 181 Conn. at 339. If the agency determines that the public interest in withholding the records clearly outweighs the public interest in disclosing them, the only determination for the Commission to make is whether the reasons for nondisclosure given by the agency are frivolous or patently unfounded. *See Lewin v. Freedom of Info. Comm'n*, 91 Conn. App. 521, 522-523 (2005); *Coalition to Save Horsebarn Hill v. Freedom of Info. Comm'n*, 73 Conn. App. 89, 99 (2002) ("*Horsebarn Hill*").

44. At the hearing on this matter, the Legal Director and the Chief of Staff testified, and it is found, that during the period at issue in the May 27, 2025 request, there were numerous communications about proposed legislation taking place within PURA and between PURA and multiple other public agencies. The Chief of Staff testified, and it is found, that the primary forum for such communications concerning such legislative proposals was on the state's OneDrive, which allowed multiple individuals to work simultaneously on a single document, without the need to send emails. Based on the Chief of Staff's testimony, it is further found, that OneDrive is maintained on the SharePoint system and each iteration of such documents were saved on SharePoint.

45. The Commission takes administrative notice of the Microsoft website available at: <https://learn.microsoft.com/en-us/sharepoint/onedrive-overview>. Based upon such website, it is found that OneDrive is a cloud storage platform, which "enables users to view, search for, and interact with files stored in OneDrive from within File Explorer, without downloading all the files to their device." It is further found, based upon such website and the testimony during the hearing, that OneDrive "allows ... users to all collaborate on the same file instead of sending different versions back and forth in email."

46. The Chief of Staff testified, and it is found, that the majority of the editing of legislative proposals was performed in the OneDrive and that such documents were "living" documents, where individuals from multiple public agencies "were going back and forth." Specifically, she testified, and it is found, that individuals from various public agencies outside of PURA, including the Office of Consumer Counsel ("OCC") and DEEP, among others, made edits and recommendations to the legislative proposals that were saved and shared on the OneDrive.

47. The Legal Director testified, and it is found, that draft legislation must be provided to the Connecticut General Assembly Office of Legislative Commissioners ("LCO"), which often makes changes to it, before it can be presented to the General Assembly for consideration.

48. In addition, it is found that legislative proposals were also shared via email communications. It is specifically found that a substantial number of the in camera records were exchanged via emails to, from and among several different public agencies, which included, among others: certain Connecticut State Representatives; certain Connecticut State Senators; certain staff members of the Connecticut State Senate Democrats; certain staff members of the LCO; certain staff members of the Connecticut General Assembly Office of Legislative Research

(“OLR”); the former Commissioner and the Deputy Chief of Staff and other staff members for DEEP; staff and advisors to the Governor; staff members of OCC, as well as the Chair; Chief of Staff; and the Director of Legislation.

49. It is found that the in camera records consist of memoranda, reports, and recommendations concerning legislation, certain of which records include cross outs, memoranda in the margins, edits and redlining.

50. It is found that above described in camera records constitute recommendations, and deliberations comprising part of the process by which government decisions and policies are formulated.

51. It is also found that the in camera records represent free exchanges of recommendations and that such records are part of the preliminary, deliberative and predecisional process that the court in *Wilson* concluded §1-210(b)(1), G.S., was meant to encompass.

52. It is found that the in camera records identified on the Index as preliminary notes and drafts constitute preliminary notes and drafts pursuant to §1-210(b)(1), G.S.

53. It is further found that the respondents conducted the balancing test described in paragraph 43, above, and made a determination that that the public interest in withholding the in camera records clearly outweighed the public’s interest in disclosure, and that they did so because they believed that disclosing such records could discourage creative thinking among the individuals involved in making recommendations concerning proposed legislation and that such disclosure could potentially disrupt negotiations concerning proposed legislation.

54. It is found that the respondents undertook the balancing test in good faith, and that the reasons for nondisclosure of the draft legislation are not frivolous or patently unfounded.

§1-210(e)(1), G.S.

55. In response to *Wilson*, the Connecticut General Assembly passed Public Act 81-431, which added to the FOI Act the language now codified in §1-210(e)(1), G.S.

56. Section 1-210(e)(1), G.S., provides in relevant part:

[n]otwithstanding [§1-210(b)(1)], **disclosure shall be required of: [i]nteragency or intra-agency memoranda or letters, advisory opinions, recommendations or any report comprising part of the process by which governmental decisions and policies are formulated**, except that disclosure shall not be required of a preliminary draft of a memorandum, prepared by a member of staff of a public agency, which is subject to revision prior to submission to or discussion among the members of such agency. . . . (emphasis added).

57. The legislative history of Public Act 81-431 “demonstrates that the enactment of what is now §1-210(e)(1) was motivated in part by the Supreme Court's decision in *Wilson*.” *Lindquist v. Freedom of Info. Comm'n*, 203 Conn. App. 512, 537 (2021) (“*Lindquist*”). More specifically, §1-210(e)(1) “was adopted, at least in part, to **require disclosure of preliminary notes and drafts that otherwise would be protected from disclosure under §1-210(b)(1).**” *Id.* at 534.

58. In the course of introducing the bill that became Public Acts 1981, No. 81–431, now §1-210(e)(1), G.S., Senator Wayne A. Baker, stated: “Mr. President, it was just six years ago that we enacted what is nationally recognized as a model Freedom of Information Act. The Act creates broad rights of public access to the records of meetings of all public agencies. It also contains a limited number of exceptions to the general rule of disclosure and openness. All of this is consistent with the Freedom of Information laws intent that the people have the fundamental right to know in a timely fashion not only what governmental decisions are but what considerations go into those decisions. Unfortunately, our Supreme Court has said in the case of *Wilson v. Freedom of Information Commission* that the Connecticut Act should be interpreted as having the same meaning as the federal act even where their language and legislative policy are dissimilar. Mr. President, this bill basically reaffirms and clarifies the original intent and purpose in light of that case. It makes clear, hopefully once and for all, that the **deliberative process of government agencies shall be open to the public** except where the legislature alone determines a superior public interest in confidentiality.” (Emphasis added.) 24 S.Proc., Pt. 17, 1981 Sess., pp. 5422–23.

59. *Lindquist* involved similar records as *Wilson*. In *Lindquist*, a tenured professor requested records related to his annual performance review. The Connecticut Appellate Court held that the final comments and ratings of the members of the performance review committee that were delivered to the dean, constituted preliminary drafts and notes within the meaning of §1-210(b)(1), G.S.; they were nonetheless required to be disclosed pursuant §1-210(e)(1), G.S., because “they constitute[d] recommendations ... comprising part of the process by which governmental decisions and policies are formulated” *Lindquist* at 534.

60. The Appellate Court therefore concluded in *Lindquist* that:

the final comments and ratings by each committee member that were delivered to the dean were no longer subject to revision, and the individual comments and ratings by each committee member were utilized by the dean to review why the committee members voted in a certain manner. Accordingly, those comments and ratings were not ‘preliminary’ under the definition provided in §1-210(e)(1).

Lindquist at 534.

61. Accordingly, §1-210(b)(1), G.S., permits a public agency to withhold records of the agency’s preliminary, predecisional, deliberative process, so long as the agency has determined that the public interest in withholding the records clearly outweighs the public interest in disclosing them. **However, interagency or intra-agency memoranda or letters, advisory**

opinions, recommendations, or reports comprising part of the process by which governmental decisions and policies are formulated must be disclosed pursuant to §1-210(e)(1), G.S. See *Shew*, 245 Conn. at 164-166.

Interagency communications and legislative proposals exchanged among PURA and other public agencies

62. Based upon paragraphs 44 through 49, above, and a careful inspection of the in camera records, it is found that the in camera records identified in Appendix A to this decision constitute memoranda or letters, reports, and recommendations concerning legislation and legislative proposals as well as substantive email communications concerning legislative recommendations, which involve multiple public agencies, many of which were sent to or shared with sitting legislators. It is further found that certain of the in camera records identified in Appendix A to this decision reflect email communications, and attachments thereto, that were sent by public agencies other than PURA but were copied to the Chair and/or the Chief of Staff of PURA. It is also found that such emails and attachments were exchanged among various public agencies, resulting in hundreds of pages of interagency exchanges.

63. Citing *Horsebarn Hill*, the respondents claim that the fact that such records originated outside of PURA or were sent to various public agencies is irrelevant to whether they constitute preliminary notes and drafts within the meaning of §1-210(b)(1), G.S. *Horsebarn Hill*, however, is inapposite to the analysis required pursuant §1-210(e)(1), G.S.

64. In *Horsebarn Hill*, the Connecticut Appellate Court concluded that “any and all public records consisting of preliminary draft documents are eligible for nondisclosure as preliminary drafts regardless of their provenance.” *Horsebarn Hill*, 73 Conn. App. at 98. *Horsebarn Hill*, however, involved a request for draft contract documents pertaining to negotiations between the University of Connecticut and **a private pharmaceutical company** relating to a potential construction project. Accordingly, that case **did not involve intra-agency or interagency memoranda or letters, recommendations or reports** comprising part of the process by which governmental decisions and policies are formulated and, therefore, the court did not address §1-210(e)(1), G.S. Accordingly, *Horsebarn Hill* is irrelevant to the present matter.

65. It is found that the in camera records identified in Appendix A to this decision are subject to disclosure as interagency memoranda or letters, recommendations, and reports “comprising part of the process by which governmental decisions. . . are formulated,” within the meaning of §1-210(e)(1), G.S. It is found that such records reflect memoranda or letters, recommendations, and reports from, to and among various public agencies and staff members of various Connecticut state agencies concerning legislation. It is further found that none is a preliminary draft of a memorandum prepared by a member of the staff of a public agency, which is subject to revision prior to submission to or discussion among the members of the same agency, as such records were shared among various public agencies.

66. Based upon the foregoing, it is concluded that the in camera records identified in Appendix A to this decision are subject to mandatory disclosure pursuant to §1-210(e), G.S. Accordingly, it is concluded that the respondents violated the disclosure provisions of §§1-210(a)

and 1-212(a), G.S., by withholding such records from the complainants.

Legislative drafts unassociated with any emails, with no author or record keeper identified

67. It is found that the in camera records, or portions thereof, identified in Appendix B to this decision, contain records of legislation with edits and redlining as well as memoranda concerning legislation.

68. As indicated in paragraph 61, above, §§1-210(b)(1) and 1-210(e)(1), G.S., together, permit the nondisclosure of an agency's preliminary, predecisional, deliberative process, provided that the agency has determined that the public interest in withholding such records clearly outweighs the public interest in disclosing them, and **provided further that such records are not interagency or intra-agency memoranda or letters, advisory opinions, recommendations, or reports comprising part of the process by which governmental decisions and policies are formulated.** See *Shew*, 245 Conn at 164-166.

69. Although the Commission has previously determined that draft legislation prepared by the Office of Legislative Management constituted preliminary drafts or notes within the meaning of §1-210(b)(1), G.S., (*DiIorio v. Executive Director, Office of Legislative Management, State of Connecticut, Connecticut General Assembly, et al.*, Docket #FIC 2024-0659 (Oct. 22, 2025); *Festa v. Executive Director, State of Connecticut, Office of Legislative Management et al.*, Docket #FIC 2019-0271 (February 26, 2020)), it is found that the present matter is materially distinct because the testimony reflects that the majority of the legislative proposals and recommendations at issue in this case were shared with multiple public agencies, and numerous proposals originated outside of PURA.

70. Thus, based upon the facts and circumstances in this matter, it is found that if the in camera records identified in Appendix B to this decision were shared with other public agencies either by PURA or by other public agencies, they would be subject to disclosure as interagency memoranda or letters, advisory opinions, recommendations, or reports "comprising part of the process by which governmental decisions. . . are formulated," within the meaning of §1-210(e)(1), G.S., unless any such record were a preliminary draft of a memorandum, prepared by a member of staff of PURA, which was subject to revision prior to submission to or discussion among the members of PURA.

71. It is found that the respondents failed to proffer any evidence concerning the author of the in camera records identified in Appendix B to this decision, nor any evidence concerning the author of the edits and proposed changes set forth therein. It is found that none of the witnesses testified that the in camera records identified in Appendix B were drafted and created by PURA and only shared within PURA. It is further found that the testimony demonstrates that the vast majority of the records were shared with other public agencies, including through the use of OneDrive or SharePoint. It is further found that certain of the in camera records identified in Appendix B include the letterhead of, or references, that reveal that such records were created by separate public agencies other than PURA, including OLR and DEEP.

72. Based upon the administrative record, the face of the in camera records and the lack of evidence to the contrary, it is found that the in camera records identified in Appendix B to this

decision are interagency or intra-agency memoranda or letters, advisory opinions, recommendations or any report comprising part of the process by which governmental decisions and policies are formulated. It is further found that such in camera records do not constitute preliminary drafts of a memorandum, prepared by a member of staff of PURA, which was subject to revision prior to submission to or discussion among the members of PURA.

73. It is concluded that the in camera records identified in Appendix B to this decision are subject to mandatory disclosure pursuant to §1-210(e), G.S. Accordingly, it is concluded that the respondents violated the disclosure provisions of §§1-210(a) and 1-212(a), G.S., by withholding such records from the complainants.

Drafts and discussions within PURA

74. Although §1-210(e)(1), G.S., requires disclosure of certain interagency memoranda, such provision states that “disclosure shall not be required of a **preliminary draft of a memorandum, prepared by a member of staff of a public agency, which is subject to revision prior to submission to or discussion among the members of such agency. . .**” (Emphasis added.)

75. Upon a careful review of the in camera records, it is found that 2025-0816-15, L. 11-23; 2025-0816-52, L. 1-16, 36-46; 2025-0816-207, L. 11-26, 37-44; 2025-0816-208, L. 12-40; 2025-0816-209, L. 11-20; 2025-0816-324, L. 8; 2025-0816-332, L. 12-36; 2025-0816-343, L. 24-38; 2025-0816-376, L. 15-25; 2025-0816-377, L. 6-49; and 2025-0816-378, L. 1-12, 26-51 were internal preliminary discussions among PURA staff members, regarding potential legislative proposals and, thus, are preliminary drafts, within the meaning of §1-210(b)(1), G.S. It is further found that such records contain PURA’s deliberative process concerning certain legislative proposals, statements, comments or recommendations.

76. It is further found that the in camera records identified in paragraph 75, above, are fairly described as preliminary records prepared by members of PURA staff, that were subject to revision and that were not otherwise interagency or intra-agency memoranda, letters, advisory opinions, recommendations or reports, within the meaning of §1-210(e)(1), G.S.

77. Accordingly, it is concluded that the respondents did not violate the disclosure requirements of §§1-210(a) and 1-212(a), G.S., by withholding the in camera records identified in paragraph 75, above.

Consideration of the Imposition of a Civil Penalty

78. In their complaint, the complainants requested that the Commission consider the imposition of a civil penalty pursuant to §1-206(b)(2), G.S.

79. Section 1-206(b)(2), G.S., provides the following, in relevant part:

[U]pon a finding that a denial of any right created by the Freedom of Information Act was without reasonable grounds and after the custodian or other official directly responsible for the denial has

been given an opportunity to be heard at the hearing conducted in accordance with sections 4-176e to 4-184, inclusive, the commission may, in its discretion, impose against the custodian or other official a civil penalty of not less than twenty dollars nor more than five thousand dollars.

80. The standard for when a violation is "without reasonable grounds" is analogous to the legal standard "without any substantial justification." *Connecticut Dept. of Pub. Safety v. Freedom of Info. Comm 'n*, Docket Nos. CV 960565902, CV 960565901 (Conn. Super. Ct. Aug. 25, 1997), *affirmed*, 247 Conn. 341 (1998). Similarly, the phrase "without reasonable justification" has been construed to mean "entirely unreasonable or without any basis in law or fact." *Id.*, quoting *Bursinkas v. Dept. of Social Services*, 240 Conn. 141, 155 (1997).

81. It is found that the Chair is no longer employed with the respondents. The Commission also notes that the Commission recently imposed a civil penalty on the Chair in *The Connecticut Light and Power Company d/b/a Eversource Energy v. Marissa Paslick Gillett, Chairman, State of Connecticut, Public Utilities Regulatory Authority, et al.*, Docket # FIC 2024-0842 (Dec. 17, 2025) ("FIC 2024-0842"). In addition, the Commission in such prior matter ordered that the respondents undergo training regarding the requirements of the FOI Act. The Commission takes administrative notice of the FOIC website which indicates that the Commission's Director of Education and Communications conducted a training at PURA on February 2, 2026. Moreover, a new Chair has been appointed to PURA.

82. It is also found that the respondents conducted a more robust search for records in the present matter than was conducted in FIC 2024-0842.

83. In addition, it is found that the respondents' withholding of the records identified in Appendix A and Appendix B to this decision was not entirely unreasonable due to the complex interplay between §§1-210(b)(1) and 1-210(e)(1), G.S.

84. Accordingly, the Commission concludes that a civil penalty is not warranted in this matter.

The following order by the Commission is hereby recommended on the basis of the record concerning the above-captioned complaint:

1. Within seven (7) days of the date of the Notice of Final Decision in this matter, the respondents shall provide the complainants with copies of the in camera records identified in Appendix A and Appendix B to this decision, unredacted and free of charge.

2. Within one week of the date of the Notice of Final Decision in this matter, the respondents shall commence an additional search for records responsive to the May 27, 2025 request. With respect to such search, the respondents are not required to conduct an additional IT search through BITS. In complying with this order, the respondents shall designate a person, other than the Legal Director, to supervise and manage the search and disclosure of responsive records that have not already been provided to the complainants. Such search must also include searches of any relevant personal devices, personal email accounts, personal social media

accounts and Google Docs accounts for responsive records. To the extent that any relevant persons are no longer employed by PURA, the respondents should nevertheless make all reasonable efforts to inquire with such individuals and to request that such individuals search their personal devices, their personal email accounts, their personal social media accounts and Google Docs accounts for responsive records.

3. Within thirty (30) days of the date of the Notice of Final Decision in this matter, the respondents shall provide the complainants with: (a) an affidavit, from someone with direct knowledge, detailing the search that was conducted; and (b) copies of all responsive records located by such search, unredacted and free of charge, that have not already been provided.

4. Henceforth, the respondents shall strictly comply with the disclosure provisions of §§1-210(a) and 1-212(a), G.S.

/s/ Mary-Kate Smith

Mary-Kate Smith
as Hearing Officer

Appendix A to FIC #2025-0816

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2025-0816-3943 to 2025-0816-4075
2025-0816-4076 to 2025-0816-4208
2025-0816-4209 to 2025-0816-4341
2025-0816-4473 to 2025-0816-4479
2025-0816-4637 to 2025-0816-4645
2025-0816-4646 to 2025-0816-4770
2025-0816-4771
2025-0816-Supplemental Record

Appendix B to FIC #2025-0816

2025-0816-528 to 2025-816-832
2025-0816-912
2025-0816-915 to 2025-0816-920
2025-0816-962 to 2025-0816-1087
2025-0816-1652 to 2025-0816-1659
2025-0816-1660 to 2025-0816-1786
2025-0816-1797 to 2025-0816-1927
2025-0816-2073
2025-0816-2092 to 2025-0816-2095
2025-0816-2096 to 2025-0816-2221
2025-0816-2222
2025-0816-2232 to 2025-0816-2239
2025-0816-2247
2025-0816-2272 to 2025-0816-2396
2025-0816-2397 to 2025-0816-2538
2025-0816-2539
2025-0816-2717 to 2025-0816-2719
2025-0816-2738 to 2025-0816-2793
2025-0816-2812 to 2025-0816-2814
2025-0816-2847 to 2025-0816-2849
2025-0816-2870 to 2025-0816-2995
2025-0816-2995 to 2025-0816-3121
2025-0816-3128
2025-0816-3133 to 2025-0816-3265
2025-0816-3391 to 2025-0816-3425
2025-0816-3623 to 2025-0816-3639
2025-0816-3640 to 2025-0816-3766
2025-0816-3771 to 2025-0816-3896
2025-0816-3923
2025-0816-3924 to 2025-0816-3942
2025-0816-4342 to 2025-0816-4472
2025-0816-4480 to 2025-0816-4623
2025-0816-4624 to 2025-0816-4636
2025-0816-4772 to 2025-0816-4777