

STATE OF CONNECTICUT
FREEDOM OF INFORMATION COMMISSION

In the Matter of a Complaint by

FINAL DECISION

Colleen Shaddox,

Complainant

against

Docket # FIC 2023-0505

Director, State of Connecticut, Department
of Economic and Community Development;
and State of Connecticut, Department of
Economic and Community Development,

Respondents

September 25, 2024

The above-captioned matter was heard as a contested case on April 4, 2024, at which time the complainant and the respondents appeared, stipulated to certain facts, and presented testimony, exhibits and argument on the complaint.

On March 26, 2024, Electric Boat Corporation moved to intervene in this matter, without objection. On April 1, 2024, the hearing officer granted such unopposed motion.

On August 9, 2024, the complainant submitted an email to the Commission stating that, in her post-hearing brief she had "included several examples of public release of information about [Electric Boat] suppliers." The complainant also attached to her August 9, 2024 email a document which the complainant indicated she wanted to attach to her brief. On August 16, 2024, the hearing officer issued an order directing the complainant to file, on or before the close of business on August 22, 2024, a motion with the Commission specifying and attaching all after-filed exhibits she wished to be admitted as evidence in this matter and setting forth the basis for the admission of such after-filed exhibits. The hearing officer also provided that the respondents and the intervenor may file a comment, reply and/or contest to such motion and the proposed after-filed exhibits, on or before August 28, 2024. However, the complainant did not file any such motion in response to the hearing officer's August 16, 2024 order.

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, on September 14, 2023, the complainant made the following request to the respondents:

I am writing a report about Electric Boat's economic impact on Connecticut. Given that they have received state grants tied to job creation, I am assuming that they've reported back to the state on [it]. I am requesting copies of those reports for the past five years. I would need them in two weeks to meet my deadline.

3. It is found that, on October 4, 2023, the respondents provided the complainant with copies of responsive records that were partially redacted.

4. By complaint filed October 6, 2023, the complainant appealed to the Commission, alleging that the respondents violated the Freedom of Information ("FOI") Act by failing to provide her with all of the records, described in paragraph 2, above.

5. It is found that, in June 2018, Electric Boat Corporation ("Electric Boat" or the "Applicant") submitted to the respondents an application for financial assistance.

6. It is found that, on or about October 19, 2018, the State of Connecticut (the "State"), acting through the Commissioner of the Department of Economic and Community Development ("DECD") and pursuant to §32-41 and Chapter 588L, G.S., entered into an agreement with Electric Boat (the "Assistance Agreement"), whereby the State and DECD agreed to provide Electric Boat with financial assistance to induce Electric Boat to identify Connecticut as Electric Boat's primary submarine production facility.

7. It is found that, pursuant to the Assistance Agreement, Electric Boat is required, among other things, to maintain a certain number of jobs in the state that pay within a targeted salary range and spend at least 200 million dollars each year for goods and services from in-state suppliers. Electric Boat is also required to provide annual reports to DECD showing its compliance with such minimum requirements set forth in the Assistance Agreement.

8. More specifically, it is found that, pursuant to §2.1 of the Assistance Agreement, the respondents agreed:

to provide financial assistance to [Electric Boat] ... in the form of (i) a forgivable loan in an amount not to exceed Thirty-Five Million and No/100 Dollars (\$35,000,000.00) (the "Loan"), and (ii) grants in an aggregate amount not to exceed Eight Million and No/100 Dollars (\$8,000,000.00) (the "Training Grant Funding", together with the Loan, the "Financial Assistance").

9. It is found that §2.4 of the Assistance Agreement provides, in relevant part, that:

[c]ommencing with the Initial Compliance Year,¹ the Applicant

¹ It is found that, pursuant to §1.20 of the Agreement, "Compliance Year" means "each twelve (12) month period commencing on July 1 and continuing through June 30 of the following year, beginning with the Initial Compliance year and ending with the Final Compliance Year." It is also found that §1.35 of the Agreement defines "Initial compliance Year" as "the Compliance year commencing July 1, 2018 and ending June 30, 2019." It is further found

will be eligible for a credit (the "Forgiveness Credit") to be applied against the outstanding principal balance of the Loan in each Compliance Year provided the Applicant has satisfied each of the Minimum Requirements and qualified for the Forgiveness Credit or any part thereof, in such Compliance Year. The aggregate amount of the Forgiveness Credit attributable to any given Compliance Year shall equal the sum of (i) the Employment Forgiveness Credit and (ii) the Supplier Spend Forgiveness Credit ... corresponding to such Compliance Year. The maximum aggregate amount of the Forgiveness Credit for any Compliance Year shall not exceed Three Million Five Hundred Thousand and No/100 Dollars (\$3,500,000.00) and the maximum aggregate amount of the Forgiveness Credit for the term of this Agreement shall not exceed Thirty-Five Million and No/100 Dollars (\$35,000,000.00).

10. It is found that, pursuant to §2.3 of the Assistance Agreement, in order for Electric Boat to receive any forgiveness of the Loan, Electric Boat was required to satisfy the following minimum requirements (the "Minimum Requirements") for each Compliance Year:

- (A) The Average Number of Employees in the State must be at least Nine Thousand Seven Hundred (9,700) ...
- (B) The Company must maintain a Gross Payroll in the State of at least eighty-five percent (85%) of the corresponding annual Gross Payroll Target set forth in the table in Schedule A attached [to the Assistance Agreement]...
- (C) The Supplier Spend Amount² must be at least \$200 million

11. It is found that §§2.3, 3.17 and 4.8 of the Assistance Agreement required Electric Boat to provide annual reports ("Compliance Reports") to DECD showing its compliance with the Minimum Requirements. It is found that Electric Boat submitted such reports for the years 2018-2019, 2019-2020, 2020-2021, and 2021-2022, that the complainant requested copies of the Compliance Reports as described in paragraph 2, above, and that the respondents provided the complainant with copies of the Compliance Reports that were available at the time of the complainant's request, with certain information redacted.

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

“[p]ublic 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

that §1.25 of the Agreement defines “Final Compliance Year” as “the Compliance Year commencing July 1, 2034 and ending June 20, 2035.”

² It is found that pursuant to §1.50 of the Assistance Agreement, "Supplier Spend Amount" means “the aggregate amount of payments for goods or services made by [Electric Boat] to their Supply Companies in connection with goods produced and services delivered in [Connecticut] during the applicable Compliance Year, excluding amounts designated by [Electric Boat] as Capital Spend.”

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.

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

[e]xcept 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 section 1-212.

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

15. It is concluded that the records described in paragraph 2, above, are public records within the meaning of §§1-200(5) and 1-210(a), G.S.

16. At the hearing on this matter, the complainant contended that Electric Boat receives tens of millions of dollars from the State and DECD and, therefore, the public has a right to know whether Electric Boat, in fact, offers good jobs and significantly contributes to Connecticut’s economy. The complainant further argued that the respondents improperly redacted from the Compliance Reports the amount that Electric Boat spends on total payroll in Connecticut and on in-state suppliers for each year, as well as the names of its in-state suppliers. The complainant contended that such information does not constitute trade secrets nor confidential information given in confidence and, thus, it is not exempt from disclosure under the FOI Act. The complainant also argued that such information does not have independent economic value, and that Electric Boat does not have any real competitors because only one other company manufactures nuclear submarines for the United States government and both Electric Boat and that other company are at maximum production.³

17. On April 4, 2024, the respondents submitted to the Commission unredacted copies of the Compliance Reports for the years 2018-2019, 2019-2020, 2020-2021, and 2021-2022, comprised of a total of seventy-three pages, along with an Index to Records Submitted for In Camera Inspection (“Index”).⁴ Such records shall hereinafter be identified as IC-2023-0505-1 through IC-2023-0505-73.

18. On the Index, the respondents contended that the redacted information described in

³ The complainant also argued in her post-hearing brief that Electric Boat and certain third parties disclosed certain information related to Electric Boat’s Connecticut suppliers; however, she failed to properly submit any evidence to support such contention, as directed by the hearing officer in her order dated August 16, 2024, described above.

⁴ The Commission notes that in addition to submitting an Index and unredacted copies of the records at issue, the respondents also submitted, as an exhibit at the contested case hearing, redacted copies of the in camera records to enable the hearing officer to review the particular redactions.

paragraph 11, above, is exempt from disclosure pursuant to §§1-210(b)(5)(A), 1-210(b)(5)(B) and 32-244(a)(13), G.S.

19. Section 1-210(b)(5), G.S., provides that a public agency is not required to disclose:

(A) Trade secrets, which for purposes of the Freedom of Information Act, are defined as information, including formulas, patterns, compilations, programs, devices, methods, techniques, processes, drawings, cost data, customer lists, film or television scripts or detailed production budgets that (i) derive independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from their disclosure or use, and (ii) are the subject of efforts that are reasonable under the circumstances to maintain secrecy; and

(B) Commercial or financial information given in confidence, not required by statute....

20. Section 32-244(a)(13), G.S., entitled "Applicability of Freedom of Information Act to data and other information re financial assistance," provides, in relevant part:

(a) All data and other information received by the Department of Economic and Community Development, Connecticut Innovations, Incorporated or any implementing agency, as defined in section 32-222, or any advisory board or committee of the department, corporation or agency, from any person in connection with an application for, or the provision of, financial assistance, which consists of the following, shall be deemed, for purposes of a public records request pursuant to the Freedom of Information Act. . . to be information described in subdivision (5) of subsection (b) of section 1-210 [trade secrets, or commercial or financial information given in confidence, not required by statute]: . . . (13) other commercial, credit or financial information with respect to the financial condition or business operations of an applicant for or recipient of financial assistance which is of a type not customarily made available to the public. (Emphasis added).

21. Section 32-244(a)(13), G.S., requires the following: (1) that the redacted information was "received by [DECD] in connection with an application for, or the provision of, financial assistance"; (2) that the redacted information is "commercial, credit or financial information with respect to the financial condition or business operations [of Electric Boat]"; and (3) that the redacted information "is of a type not customarily made available to the public." If these three elements are met, the redacted information "shall be deemed" to be information exempt under §1-210(b)(5), G.S.

22. At the hearing on this matter, the Legal Director for DECD appeared and testified on

behalf of the respondents and the Director for Supply Chain and Procurement for Electric Boat (the "Supply Chain Director") also appeared and testified.

23. Based upon the testimony at the hearing on this matter, it is found that Electric Boat designs, builds and maintains nuclear power submarines for the United States Navy. Based upon a review of the Compliance Reports themselves, it is found that Electric Boat engaged a certified public accountant to prepare the Compliance Reports and that they contain certified findings and the accountant's opinion regarding Electric Boat's average number of employees, gross payroll, the names of its suppliers and the amounts Electric Boat paid such suppliers. It is found that Electric Boat submitted the Compliance Reports to the DECD for Compliance Years 2018-2019, 2019-2020, 2020-2021, and 2021-2022 pursuant to the requirements of the Assistance Agreement and to establish its qualifications for financial assistance.

24. It is found that, based upon the testimony provided at the hearing and a careful review of the in camera records, the information in the Compliance Reports constitutes data and other information received by DECD by any person in connection with an application for, or the provision of, financial assistance, within the meaning of §32-244(a), G.S.

25. Connecticut appellate case law has not defined "commercial or financial information," as used in §32-244(a)(13), G.S. The Commission has looked to Exemption 4 in the federal FOI Act, which protects "commercial or financial information obtained from a person [that is] privileged and confidential." See e.g., John Scott v. Chief, Poquonock Bridge Fire District, et al., Docket #FIC 2015-727 (March 8, 2016); DatabaseUSA LLC v. Commissioner, State of Connecticut, Department of Administrative Services, Docket #FIC 2015-209 (February 10, 2016).

26. "Commercial" information, as it is used in the federal FOI Act, 5 U.S.C. §552, has been construed broadly to mean any information related to business or trade. See COMPTEL v. F.C.C., 910 F. Supp. 2d 100, 115 (D.D.C. 2012) ("COMPTEL"); Hitkansut LLC v. United States, 111 Fed. Cl. 228, 236 (2013) ("Hitkansut"); Watkins v. U.S. Bureau of Customs and Border Protection, 643 F.3d 1189, 1194 (9th Cir. 2011) (intimate aspects of an importer's business such as supply chains and fluctuations of demand for merchandise contained commercial information); Public Citizen Health Research Group v. FDA, 704 F.2d 1280, 1290 (D.C. Cir. 1983); James Craven et al. v. Governor, State of Connecticut et al., Docket #FIC2011-152, (March 14, 2012) (finding that a company's name is related to the company's business or trade and concluding, therefore, that the names of the employers referenced by the Governor in an address constitute commercial information). The term commercial information, as used in the federal FOI Act, not only includes information that relates to income-producing aspects of a business or information that reveals basic commercial operations; it also "reaches more broadly and applies (among other situations) when the provider of the information has a commercial interest in the information submitted to the agency." Baker & Hostetler LLP v. U.S. Dept. of Commerce, 473 F.3d 312, 319 (D.C. Cir. 2006); COMPTEL, 910 F. Supp. 2d at 115; Hitkansut, 111 Fed. Cl. at 236. In short, "commercial" includes anything pertaining, or relating, to or dealing with commerce that serves a commercial function or is of a commercial nature. See American Airlines, Inc. v. National Mediation Bd., 588 F.2d 863, 870 (2d Cir. 1978); Public Citizen v. United States Dept. of Health and Human Servs., 2014 WL 4388062, *207-08 (D.D.C. 2014). The term "financial information" includes commercial financial information, such as

records that reveal basic commercial operations, or relate to the income-producing aspects of a business, as well as personal financial information. See, Washington Post Co. v. U.S. Dept. of Health and Human Services, 690 F.2d 252, 266 (D.C. Cir. 1982).

27. Based upon the testimony at the hearing on this matter and a careful review of the in camera records, it is found as follows:

- (a) that the redacted information contained within IC 2023-0505-24, lines 6-10 is comprised of gross payroll information for Electric Boat's Connecticut employees;
- (b) that a portion of the redacted information contained within IC 2023-0505-5, lines 6-10; IC 2023-0505-16, lines 11-13; IC 2023-0505-18, line 7; IC 2023-0505-35, lines 11-13; IC 2023-0505-37, line 7; IC 2023-0505-43, lines 6-10; IC 2023-0505-51, lines 11-13; IC 2023-0505-53, line 7; IC 2023-0505-59, lines 6-10; IC 2023-0505-70, lines 11-13; and IC 2023-0505-72, line 7 constitutes gross payroll information for Electric Boat's Connecticut employees;
- (c) that the redacted information on IC 2023-0505-6, lines 5, 7-42; lines 5-45 on IC 2023-0505-7 through IC 2023-0505-15; a portion of IC 2023-0505-16, lines 21-24; a portion of IC 2023-0505-18, line 8; IC 2023-0505-25, lines 5, 7-42; lines 5-45 on IC 2023-0505-26 through IC 2023-0505-33; IC 2023-0505-34, lines 5-41; a portion of IC 2023-0505-35, lines 21-24; a portion of IC 2023-0505-37, line 8; IC 2023-0505-44, lines 5, 7-32; lines 5-45 on IC 2023-0505-45 through IC 2023-0505-49; IC 2023-0505-50, lines 5-8; a portion of IC 2023-0505-51, lines 21-24; a portion of IC 2023-0505-53, line 8; IC 2023-0505-60, lines 5, 7-42; lines 5-45 on IC 2023-0505-61 through IC 2023-0505-68; IC 2023-0505-69, lines 5-40; a portion of IC 2023-0505-70, lines 21-24; and a portion of IC 2023-0505-72, line 8 is comprised of information related to the Connecticut companies which supply goods and services to Electric Boat and the spend amounts Electric Boat paid to each company;
- (d) that a portion of the redacted information contained within IC 2023-0505-5, lines 6-10; IC 2023-0505-16, lines 11-13, 21-24; IC 2023-0505-18, lines 6-8; IC 2023-0505-35, lines 11-13, 21-24; IC 2023-0505-37, line 6-8; IC 2023-0505-43, lines 6-10; IC 2023-0505-51, lines 11-13, 21-24; IC 2023-0505-53, lines 6-8; IC 2023-0505-59, lines 6-10; IC 2023-0505-70, lines 11-13, 21-24; and IC 2023-0505-72, lines 6-8 includes certain descriptors that do not constitute gross payroll information nor supplier spend information;

- (e) that a portion of the redacted information contained within IC 2023-0505-5, lines 11-14; IC 2023-0505-18, lines 6-8; IC 2023-0505-37, lines 6-8; IC 2023-0505-53, lines 6-8; and IC 2023-0505-72, lines 6-8 describes the Minimum Requirements as set forth in the Assistance Agreement;
- (f) that the redacted information, or portions thereof, on IC 2023-0505-18, line 6; IC 2023-0505-37, line 6; IC 2023-0505-53, line 6; and IC 2023-0505-72, line 6 constitutes the average number of individuals who Electric Boat employs in Connecticut.

28. Based upon the testimony provided at the hearing and a careful review of the in camera records, it is found that all of the redacted information described in paragraph 27, above, is commercial and/or financial information with respect to the financial condition or business operations of Electric Boat, within the meaning of §32-244(a)(13), G.S.

29. With respect to whether the redacted information is of a type not customarily made available to the public, within the meaning of §32-244(a)(13), G.S., the Commission takes administrative notice of the legislative history of House Bill 5684 (hereinafter “HB 5684”) of the 2000 Regular Session of the Connecticut General Assembly, which ultimately included the language contained in §32-244(a), G.S. The testimony before the Government Administration and Elections Committee on HB 5684 indicates a desire to protect the proprietary information of private entities doing business with, or applying for assistance from, the State or DECD. See, Connecticut General Assembly Joint Standing Committee on Government Administration and Elections, Public Hearing, February 28, 2000, pages 28-36 and 50-63.

30. It is found that the Supply Chain Director has worked for Electric Boat for thirty years in various capacities and that his current responsibilities include placing contracts with Electric Boat suppliers as well as managing the work that is conducted pursuant to such contracts. The Supply Chain Director testified, and it is found, that Electric Boat considers the gross payroll, supplier spend amounts, and the list of its Connecticut suppliers to be private and business sensitive information. He further testified, and it is found, that Electric Boat does not customarily disclose such information to the public, that it limits the disclosure of such information to employees who require such information to conduct their employment duties, and that it takes reasonable steps to keep such information confidential. It is also found that the Supply Chain Director reviewed Electric Boat's official policies and procedures and that certain of its policies prohibit employees from disclosing the company's commercial or financial information to third parties.

31. The Supply Chain Director additionally testified, and it is found, that Electric Boat has competitive reasons for keeping its payroll and supplier information confidential and that, if such information were publicly available, competing businesses could use the information to Electric Boat's disadvantage in the marketplace. Based upon the testimony, it is found that Electric Boat currently has one major competitor in the nuclear submarine industry and that it competes with other companies for suppliers and workers. In addition, it is found, based upon the testimony, that the disclosure of Electric Boat's Connecticut supplier-spend information could provide the competitors of Electric Boat's suppliers an economic advantage to the

disadvantage of Electric Boat's suppliers, which in turn could harm Electric Boat's relationships with its suppliers.

32. Based upon the testimony at the hearing, it is also found that Electric Boat seeks to keep the list of its Connecticut suppliers confidential because many of its suppliers have access to Electric Boat's highly technological and sensitive information related to the nuclear submarines it supplies to the United States Navy, which adversaries in other countries try to illegally access and, therefore, disclosing such suppliers' identities could make them potential targets for cyber-attacks and espionage.

33. Based upon a careful review of the in camera records and the evidence presented at the hearing, it is found that the redacted information described in paragraphs 27(a) (gross payroll information), 27(b) (gross payroll information), and 27(c) (supplier information), above, is of a type not customarily made available to the public, within the meaning of §32-244(a)(13), G.S.⁵

34. Based upon the foregoing, it is found that the redacted information described in paragraphs 27(a), 27(b), and 27(c), above, is exempt from disclosure pursuant to §§1-210(b)(5) and 32-244, G.S.

35. Accordingly, it is concluded that the respondents did not violate §§1-210(a) and 1-212(a), G.S., by withholding the redacted information described in paragraphs 27(a), 27(b), and 27(c), above, from the complainant.

36. With respect to the redacted information described in paragraphs 27(d) (certain descriptors), 27(e) (the Minimum Requirements), and 27(f) (average number of Connecticut employees), above, it is found that the respondents likely mistakenly redacted such information, given that most of such information was provided in other portions of the records provided to the complainant.

37. It is found that, in each of the Compliance Reports provided to the complainant, the respondents disclosed the following information to the complainant: an Independent Accountant's Report, the number of Electric Boat's Connecticut employees for each quarter, the average number of Electric Boat's Connecticut employees, the baseline employment number, the amount over the baseline, the preliminary employment credit, the percentage under or over the employment target, the reduction of or addition to the preliminary employment credit, the employment forgiveness credit, the supplier spend forgiveness credit, the total forgiveness credit, a summary of the results of the audit, which included the employment forgiveness and supplier spend protocols, a certification of whether the project met the Minimum Requirements and the Applicant's certification. It is further found that the respondents provided a copy of the Assistance Agreement to the complainant at the commencement of the contested case hearing, which sets forth the Minimum Requirements.

38. Based upon the foregoing, it is found that the respondents failed to prove that the

⁵ Because it is found that the redacted information described in paragraphs 27(a) (gross payroll information), 27(b) (gross payroll information), and 27(c) (supplier information), above, is exempt from mandatory disclosure pursuant to §32-244(a)(13), G.S., the respondents need not separately prove that such redacted information is exempt from disclosure pursuant to §§1-210(b)(5)(A) or 1-210(b)(5)(B), G.S.

redacted information described in paragraphs 27(d), 27(e), and 27(f), above, is of a type not customarily made available to the public, within the meaning of §32-244(a)(13), G.S.

39. Additionally, it is found that the respondents failed to prove that the redacted information described in paragraphs 27(d), 27(e), and 27(f), above, constitutes trade secrets, within the meaning of §1-210(b)(5)(A), G.S., or commercial or financial information given in confidence, not required by statute, within the meaning of §1-210(b)(5)(B), G.S.

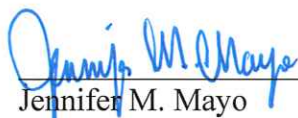
40. It is concluded that the respondents violated the disclosure provisions of §§1-210(a) and 1-212(a), G.S., by withholding the minimal information described in paragraphs 27(d), 27(e), and 27(f), above; however, such violation was de minimis.

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

1. Within fourteen days of the Notice of Final Decision in this matter, the respondents shall provide the complainant with unredacted copies of the portions of the in camera records specifically identified in paragraphs 27(d) (certain descriptors), 27(e) (the Minimum Requirements), and 27(f) (average number of Connecticut employees) of the findings, above, free of charge.

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

Approved by Order of the Freedom of Information Commission at its regular meeting of September 25, 2024.



Jennifer M. Mayo
Acting Clerk of the Commission

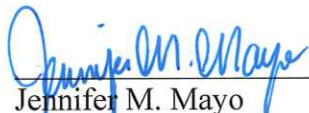
PURSUANT TO SECTION 4-180(c), G.S., THE FOLLOWING ARE THE NAMES OF EACH PARTY AND THE MOST RECENT MAILING ADDRESS, PROVIDED TO THE FREEDOM OF INFORMATION COMMISSION, OF THE PARTIES OR THEIR AUTHORIZED REPRESENTATIVE.

THE PARTIES TO THIS CONTESTED CASE ARE:

COLLEEN SHADDOX, 22 Warner Road, East Haddam, CT 06423

DIRECTOR, STATE OF CONNECTICUT, DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT; AND STATE OF CONNECTICUT, DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT, c/o Assistant Attorney General Diaghilev Lubin-Farnell, Office of the Attorney General, 165 Capitol Avenue, Hartford, CT 06106

ELECTRIC BOAT CORPORATION, c/o Andrew A. DePeau, Robinson & Cole, LLP, 280 Trumbull Street, Hartford, CT 06103



Jennifer M. Mayo
Acting Clerk of the Commission