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STATE OF CONNECTICUT
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PETITION OF THE UNITED ILLUMINATING
COMPANY FOR A DECLARATORY RULING
THAT NO CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED IS REQUIRED
REGARDING REPLACEMENT/RELOCATION OF
115kV TRANSMISSION LINES CROSSING THE
HOUSATONIC RIVER IN STRATFORD &
MILFORD, CONNECTICUT

PETITION NO. 1138

JANUARY 30, 2015

**MOTION OF THE UNITED ILLUMINATING COMPANY
FOR PROTECTIVE ORDER**

On January, 30 2015 The United Illuminating Company (“UI” or the “Company”) filed a Petition for Declaratory Ruling for a determination from the Connecticut Siting Council (“Council”) that no Certificate of Environmental Compatibility and Public Need is required for the proposed replacement/relocation of 115kV transmission lines crossing the Housatonic River in Stratford and Milford (the “Petition”).

The Company hereby moves that the 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 Richard Reed, dated January 29, 2015, UI asks that the protective order specifically include certain information contained in the Company’s Petition.

The Petition contains Critical Energy Infrastructure Information (“CEII”) as defined by the Federal Energy Regulatory Commission (“FERC”).¹ The FERC requires specific

¹ 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.²

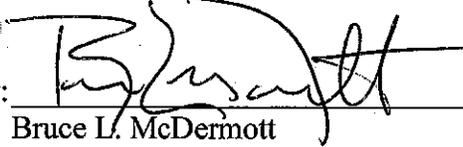
For the above reasons, UI respectfully moves that the Council grant the Company's Motion for Protective Order.

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.”

² 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.

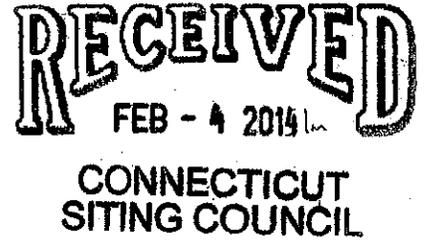
Respectfully submitted,

THE UNITED ILLUMINATING COMPANY

By: 

Bruce L. McDermott
Managing Counsel - Operations
UIL Holdings Corporation
157 Church Street
New Haven, CT 06506-0901
(203) 499-2422

STATE OF CONNECTICUT
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PETITION NO. 1138

JANUARY 30, 2015

AFFIDAVIT OF RICHARD J. REED

STATE OF CONNECTICUT)
 : ss: Orange January 30, 2015
COUNTY OF NEW HAVEN)

I, Richard Reed, being duly sworn, states:

1. I am the Vice President – Engineering and Project Excellence, for The United Illuminating Company (“UI” or the “Company”), 180 Marsh Hill Road, Orange, Connecticut. I am over the age of eighteen years and understand the obligations of making statements under oath.

2. I am familiar with UI’s Petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is required for the proposed replacement/relocation of 115kV transmission lines crossing the Housatonic River in Stratford and Milford (the “Petition”).

3. I submit this affidavit in support of the Company’s Motion for Protective Order filed contemporaneously herewith requesting a ruling from the Council that

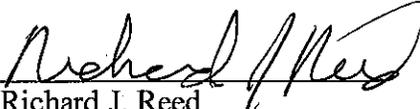
various information contained in the Company's Petition constitutes "Confidential Information" entitled to confidential treatment.

4. The Petition contains Critical Energy Infrastructure Information ("CEII") as defined by the Federal Energy Regulatory Commission ("FERC").¹ The FERC requires specific 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 D&M Plan. The Company also asks that recipients of such CEII be required to abide by existing best practices for maintaining the security of CEII.²

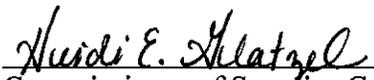
¹ CEII is "specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (i) relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) could be useful to a person in planning an attack 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."

² 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.

5. The Company has used its best efforts to keep and maintain the Confidential Information secret. To the best of my knowledge, such information has not been disclosed or released to the public.


Richard J. Reed

Subscribed and sworn to before
me this 28th day of January, 2015


~~Commissioner of Superior Court~~
Notary Public HEIDI E. GLATZEL
My Commission Expires: 6-30-19

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PETITION NO. 1138

PETITION OF THE UNITED ILLUMINATING :
COMPANY FOR A DECLARATORY RULING :
THAT NO CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED IS REQUIRED :
REGARDING REPLACEMENT/RELOCATION OF :
115kV TRANSMISSION LINES CROSSING THE :
HOUSATONIC RIVER IN STRATFORD & :
MILFORD, CONNECTICUT :

February 5, 2015

**PROTECTIVE ORDER CONCERNING
THE UNITED ILLUMINATING COMPANY'S
PROVISION OF CONFIDENTIAL AND PROPRIETARY INFORMATION**

WHEREAS, The United Illuminating Company (“UI” or the “Company”) is providing information to the Connecticut Siting Council (“Council”) in Petition No. 1138 in connection with its Petition for Declaratory Ruling that no Certificate of Environmental Compatibility and Public Need is required for proposed replacement/relocation of 115kV transmission lines crossing the Housatonic River in Stratford and Milford (the “Petition”), which information would, in the opinion of the Company, result in the disclosure of commercially sensitive, confidential and proprietary information, including Critical Energy Infrastructure Information (“CEII”) as defined by the Federal Energy Regulatory Commission (“FERC”).¹

¹ 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 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.”

CONFIDENTIAL
MAY 2 - 2012
CREDIT INFORMATION
110
NOW, THEREFORE, it is hereby ordered, that the following procedure is adopted for the protection of the information provided by the Company ("Confidential Information"):

1. All Confidential Information provided by the Company, whether in documentary form or otherwise, shall be identified essentially as follows: "Petition No. 1138 Confidential Information," and will be governed by the terms of this Protective Order ("Order"). The Order is applicable to all such Confidential Information, whether in the form of documents, data, testimony, studies, or otherwise.

2. All Confidential Information made available pursuant to this Order shall be given to Chairman, Council, and staff of Council upon execution of the Acknowledgement referenced below. Consultants retained by Council shall also be provided with the Confidential Information upon their becoming signatories to the Order and executing the Nondisclosure Agreement, attached hereto as Exhibit 1 ("Signatories"). Upon a showing of good cause, Council may place additional restrictions upon the access to Confidential Information given to certain parties and intervenors.

Chairman, Council, and staff of Council are bound by the terms of the Order. Signatories to this Protective Order agree to be bound by its terms and shall not use the Confidential Information except for purposes of this proceeding. All parties and intervenors, including consultants, in receipt of the Confidential Information under the Order, shall maintain a written log of all individuals granted access to said Confidential Information. All persons granted access to the Confidential Information shall neither use nor disclose the

Confidential Information for purposes of business or competition, or for any other purpose, other than for purposes of preparation for and conduct of this proceeding solely as contemplated herein and shall in good faith take all reasonable precautions to keep the Confidential Information secure in accordance with the purposes and intent of the Order.

3. Confidential Information will be marked as such and delivered in sealed envelopes to Melanie Bachman, Acting Executive Director of the Connecticut Siting Council. A statement essentially in the following form shall be placed prominently on each envelope:

“CONFIDENTIAL-PROPRIETARY

This envelope is not to be opened nor the contents to be displayed or revealed except pursuant to the pertinent Protective Order issued in Petition No. 1138”

4. Any Confidential Information made available pursuant to the Order shall be part of the record in the petition cited above, subject to the same relevancy and other evidentiary considerations as non-confidential information, subject to the conditions stated in Paragraphs Five and Six of the Order.

5. If the Confidential Information is used in any manner in any interrogatory, letter, petition, brief or other writing (“Document”), all reference to the Confidential Information in the Document shall be either:

- (a) in a separate document, prominently labeled “Proprietary Information,” which document shall be safeguarded in accordance

with the Order and distributed only to Chairman, Council, and staff of Council and to Signatories; or

- (b) solely by title or exhibit reference, in a manner reasonably calculated not to disclose the Confidential Information.

6. If the Confidential Information is used in any manner in any proceeding or during the course of a public hearing before the Council ("Hearing"), the Hearing shall not be held before, nor any record of it made available to, any party, intervenor, or other person or entity not a Signatory, other than the appropriate Council staff. Presence at the Hearing shall be limited to the Chairman, Council, and appropriate staff of Council, representatives of the Company, and Signatories to this Protective Order. No record shall be disclosed, nor any communication made, of use of the Confidential Information in the Hearing to any person or entity not a Signatory, other than the appropriate Council staff. Any transcript or other recording of the Hearing which relates to the Confidential Information shall be placed in sealed envelopes or containers and a statement essentially in the following form placed prominently on such envelope or container:

"CONFIDENTIAL-PROPRIETARY

This envelope is not to be opened nor the contents to be displayed or revealed except pursuant to the pertinent Protective Order issued in Petition No. 1138."

7. Nothing herein shall be construed as a final determination that any of the Confidential Information will be admissible as substantive evidence in this proceeding or at any hearing or trial. Moreover, nothing herein shall be considered a waiver of any party's right to assert at a later date that the material is or is not proprietary or privileged. A party seeking to change the terms of the Order shall by motion give every other party five (5) business days prior written notice. No information protected by the Order shall be made public until the Council rules on any such motion to change the terms of the Order. Confidential Information otherwise properly discovered, even though also subject to the terms of the Order, shall not be considered protected by the Order.

8. All copies of such Confidential Information shall be returned to the Company no later than thirty (30) days after the expiration of all appeal periods applicable to the final decision rendered in this proceeding.

CONNECTICUT SITING COUNCIL

Dated: _____, 2015

By _____
Chairman

**NONDISCLOSURE AGREEMENT AND
AGREEMENT TO BE BOUND BY THE
TERMS OF THE PROTECTIVE ORDER**

The undersigned hereby acknowledges review of the Protective Order filed,
_____ in Petition No. 1138 in connection with The United Illuminating Company's
Petition for a Declaratory Ruling that no Certificate of Environmental Compatibility and
Public Need is required for modifications to the Hawthorne Substation in Fairfield, CT and
hereby agrees to abide by the terms thereof, in exchange for receipt of the Confidential
Information from The United Illuminating Company.

Recipient: _____

Date: _____

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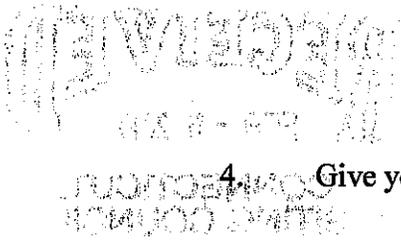
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PETITION NO. 1138

February 5, 2015

**REQUEST FOR INFORMATION
CRITICAL ENERGY INFRASTRUCTURE INFORMATION ("CEII")
PURSUANT TO PROTECTIVE ORDER**

1. This form must be accompanied by an original signed Non-Disclosure Agreement (Exhibit 1 to the Protective Order entered in this proceeding).
2. The undersigned requests the following information:
3. The undersigned is (check as appropriate):
 - A party or intervenor in the above-captioned proceeding, having been admitted as such on _____
 - A state agency employee
 - A federal agency employee
 - An employee of the electricity reliability organization or regional entity
 - An employee of ISO-NE or another independent system operator or regional transmission organization in North America
 - An employee of a transmission owner in another control area
 - An employee of a distribution owner in another control area
 - A consultant of one of the entities above who has been retained to provide advice regarding the above-captioned proceeding.



4. Give your name and title:

5. The undersigned represents and warrants and agrees that the information is to be used solely for the following purposes [describe in detail]:

6. If you are a consultant, provide the name and contact information of an individual at the organization that has retained you so that we may verify your role:

I acknowledge that the foregoing is true and accurate, and agree to give The United Illuminating Company ("UI") immediate notice if any of the foregoing is no longer true. I also consent to UI and its affiliated companies sharing the fact that this request has been made and/or granted, and agree that UI and its parent and affiliated companies shall have no liability to me in connection with this request.

By: _____

Print Name: _____

Organization: _____

Title: _____

Business Address: _____

Email: _____

Phone: _____

Fax: _____

Date: _____