STATE OF CONNECTICUT SITING COUNCIL

	The Connecticut Light and Power
	Company application for a Certificate of
	Environmental Compatibility and Public
i	Need for the Interstate Reliability Project
I	consisting of new overhead 345-kV electric
	transmission lines and associated facilities
	extending between CL&P's Card Street
ļ	Substation in the Town of Lebanon, Lake
ŀ	Road Switching Station in the Town of
	Killingly, and the Connecticut/Rhode
l	Island border (in the Town of Thompson)
	and related additions at CL&P's existing
	Card Street Substation, Lake Road
l	Switching Station, and Killingly
	Substation,

DOCKET NO. 424

February 9, 2012

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

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

PART A – NON-REDACTED PLANNING REPORTS

EX. 1 ¹ :	ISO-NE, "Southern New England Transmission Reliability, Report 1 – Need
	Analysis," January 2008
EX. 2:	ISO-NE, "New England East-West Solutions (Formerly Southern New England
	Transmission Reliability), Report 2 – Options Analysis," June 2008
EX. 4:	ISO-NE, "New England East-West Solution (NEEWS): Interstate Reliability
	Project Component Updated Needs Assessment," April 2011
EX. 5:	ICF Inc., "Assessment of Non-Transmission Alternatives to the NEEWS
	Transmission Projects: Interstate Reliability Project," December 2011
EX 6:	ISO-NE, "New England East-West Solution (NEEWS): Interstate
	Reliability Project Component Updated Solution Study Report,
	February 2012

PART B - PHYSICAL SECURITY OF PROPOSED FACILITY

The CEII Appendix has been filed contemporaneously with this motion, with each document in a sealed and properly labelled envelope

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

CL&P seeks to protect information contained in the CEII Appendix and such other CEII as may later be filed from unrestricted disclosure to the public because it identifies specific existing weaknesses and vulnerabilities of the transmission systems of Southern New England (Part A) and specific vulnerabilities of the proposed facilities and security measures to mitigate them (Part B).

As explained more fully in the accompanying Memorandum of Law, information in the CEII Appendix is required to be accorded confidential treatment by the policies of the Federal Energy Regulatory Commission, as stated in its Order 890, issued February 16, 2007; and by policies of the Independent System Operator, New England and CL&P. The information is

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¹ The designation of these documents corresponds to that of the Redacted Versions of the same documents provided, or to be provided, in Volume 5 of the Application. There is no EX. 4 in the CEII Appendix because EX. 4 in Volume 5, the 2008 Solution Report, does not contain CEII and therefore was provided in full in Volume 5.

exempt from disclosure under the Connecticut Freedom of Information Act, Conn. Gen. Stats. Sec.1-200 *et seq.*, because disclosure of the information may result in a risk of harm to a facility owned by a public service company.

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

Respectfully submitted,

THE CONNECTICUT LIGHT AND POWER COMPANY

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