

STATE OF CONNECTICUT
SITING COUNCIL

THE UNITED ILLUMINATING COMPANY'S : PETITION NO. _____
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 : : OCTOBER 30, 2014
:

AFFIDAVIT OF RICHARD J. REED

STATE OF CONNECTICUT)
 : ss: Orange October 30, 2014
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 proposed modifications to the Hawthorne Substation located at 180 Hawthorne Drive, Fairfield, CT (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 30th day of October 2014


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