

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
	:	

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

On October 30, 2014 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 proposed modifications to the Hawthorne Substation located at 180 Hawthorne Drive in Fairfield, Connecticut (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 October 30, 2014, UI asks that the protective order specifically include the 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 distribution of energy; (ii) could be useful to a person in planning an attack on critical infrastructure; (iii) is

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.

Respectfully submitted,

THE UNITED ILLUMINATING COMPANY

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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.