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Admitted in: NH ME VT RI MA

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Edward Damon, Esq. NH Public Utilities Commission 21 S. Fruit Street, Suite 10 Concord, NH 03301-2429

Re: Northern Utilities, Inc., Docket No. DG 05-147, 2005-2006 Winter Cost of Gas Motions for Protection

Dear Mr. Damon:

I am writing with reference to pending Motions for Protection from Public Disclosure and Confidential Treatment for information used to prepare Northern's Winter Cost of Gas in the above-referenced docket.

The purpose of these Motions is to seek protection for proprietary information used to prepare Northern's filing in this docket, which includes information regarding suppliers and their charges, resource information, commodity and demand charges, and related contract terms. We believe that these materials constitute trade secrets that require a protective order.

On September 14, 2005, Northern filed a Motion for Protection for certain information in the Updated Model Delivery tariff, which Staff indicated it did not have any objection to during the hearing in this matter on October 26, 2005.

A second motion, filed on September 29, 2005 and amended on October 19th, 2005, requested Confidential Treatment of information used to prepare the Company's Cost of Gas Factor. At the hearing, you stated:

... if this information has been publicly disclosed elsewhere, the Comission, in Staff's view, ought no to be trying to protect it now. But to the extent that the amended motion seeks to protect information in the

revised filing that is not otherwise publicly disclosed, the Staff would have no objection to that.

DG05-147 October 26, 2005 Hearing transcript, p. 156.

The information at issue has not been publicly disclosed. This type of information has not been explicitly made publicly available in the past, and Northern believes that the release of this information is likely to result in competitive disadvantage for the Company, and subsequently for its customers. Therefore, we resepectfully request that it be protected and treated confidentially.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Seth L. Shortlidge Patricia M. French

SLS:ams

cc: Service List