

STATE OF NEW HAMPSHIRE
BEFORE THE PUBLIC UTILITIES COMMISSION

RE: GLACIAL NATURAL GAS, INC.

DOCKET NO. DM 10-036

APPLICATION FOR REGISTRATION AS A COMPETITIVE
NATURAL GAS SUPPLIER

MOTION FOR PROTECTIVE ORDER AND CONFIDENTIAL TREATMENT

Glacial Natural Gas, Inc. (hereinafter, "Applicant") respectfully requests that the Commission issue a protective order regarding certain materials in the above-captioned proceeding. In support of its motion, Applicant states as follows:

1. As part of its filing relating to its renewal application for registration as a Competitive Natural Gas Supplier in the State of New Hampshire, Applicant must submit financial statements to the Commission. Specifically, Applicant has submitted consolidated 2010-2011 financial statements of its parent company, Glacial Energy Holdings. See Exhibit A.
2. This information should be protected as confidential commercial information. Applicant is a privately held corporation, and does not disclose this information to anyone outside of its corporate affiliates and their representatives.
3. By this Motion, Applicant is seeking a protective order regarding these financial statements.
4. Release of the information that Applicant seeks to protect is likely to result in a competitive disadvantage for Applicant. Competitors possessing the confidential information described above would be aware of the intimate details of Applicant's finances.
5. RSA 91-A:5, IV expressly exempts from the public disclosure requirements of Chapter 91-A any records pertaining to "confidential, commercial or financial information." The Commission has the authority to protect the information described above pursuant to N.H. Code of Admin. Rules PUC 203.08.

6. Applicant requests that the Commission issue a protective order granting this motion and protecting from public disclosure the confidential commercial information described above. Copying, duplication, dissemination or disclosure in any form should be prohibited and the protected materials should be returned at the conclusion of the proceeding or destroyed on terms acceptable to Applicant.

WHEREFORE, Glacial Natural Gas, Inc. respectfully requests that the Commission:

- A. Issue an order protecting the CNGS renewal application filing as described above; and
- B. Grant such other and further relief as may be just and equitable.

Respectfully submitted,

Date: July 9, 2012

GLACIAL NATURAL GAS, INC.

By: 

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CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion for Protective Order and Confidential Treatment has been forwarded to the Office of the Consumer Advocate.

Dated: July 9, 2012



Adam Gusman