

DE06-115

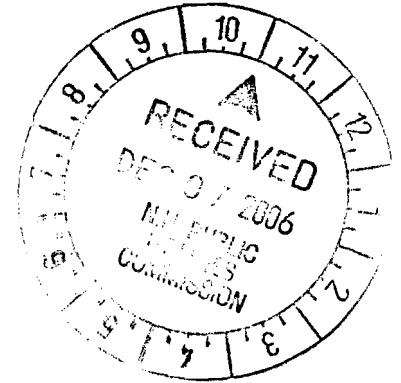
nationalgrid

Alexandra E. Blackmore
Senior Attorney

December 6, 2006

VIA OVERNIGHT & ELECTRONIC MAIL

Ms. Debra A. Howland
Executive Director and Secretary
New Hampshire Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, New Hampshire 03301-2429



**Re: DE 06-___; Granite State Electric Company d/b/a National Grid
Motion for Confidential Treatment - Large Customer Group Default Service
Indicative Bid Summary**

Dear Ms. Howland:

I am submitting seven copies of a Motion for Confidential Treatment on behalf of Granite State Electric Company d/b/a National Grid for the above-captioned Default Service Indicative Bid Summary. Also enclosed are seven copies of the Default Service Indicative Bid Summary. Please note that the Default Service Indicative Bid Summary was provided to Suzanne Amidon and George McCluskey via electronic mail on December 1, 2006 and supplemented on December 4, 2006 pursuant to the enclosed Motion for Confidential Treatment.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to contact me at (508) 389-3243.

Very truly yours,

Alexandra E. Blackmore

Alexandra E. Blackmore

Enclosures

cc: Donald J. Pfundstein, Esq.
Meredith A. Hatfield, Esq.

**STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION**

DEFAULT SERVICE INDICATIVE BID SUMMARY)	
)	
GRANITE STATE ELECTRIC COMPANY d/b/a)	Docket DE 06-___
NATIONAL GRID)	
)	

MOTION FOR CONFIDENTIAL TREATMENT

Granite State Electric Company d/b/a National Grid (“National Grid”) respectfully requests that the New Hampshire Public Utilities Commission (the “Commission”) grant a protective order for certain confidential information, consistent with R.S.A. 91-A:5(IV) and N.H. Admin. Rules, Puc 203.08. Specifically, National Grid requests that the Commission issue an order requiring confidential treatment for material contained in National Grid’s Default Service Indicative Bid Summary (the “Summary”).

In support of this motion, National Grid states the following:

1. The Summary contains the following information and material: a chart illustrating indicative bids for the most recent procurement period for large customers in dollars per megawatt-hour, both inclusive and exclusive of capacity costs. The Summary also includes a chart illustrating indicative bids for the most recent procurement period for large customers in cents per kilowatt-hour, both inclusive and exclusive of capacity costs. In addition, the Summary includes a chart comparing the current rates through January 31, 2007 on a cents per kilowatt-hour basis to average indicative rates including capacity costs. The Summary also identifies the names of the bidders through a bidder key.
2. National Grid seeks protection from public disclosure of all of the information contained in the Summary because it is confidential commercial and financial information. The bidding suppliers’ information, including bid price and non-price terms, and other information provided to National Grid in response to the RFP, has been provided to National Grid pursuant to express understandings that this material will be maintained as confidential. National Grid submits that suppliers will be reluctant to participate in future solicitations by National Grid, and may completely refuse to participate in this market, if their confidential bid information is publicly disclosed. Disclosure of this information may also detrimentally impact upon such suppliers’ ability to participate in competitive solicitations in other markets within the northeast region as well.
3. R.S.A. 91-A:5(IV) expressly exempts from public disclosure requirements of the Right-to-Know law, R.S.A. 91-A, any records pertaining to “confidential, commercial

or financial information.” The Commission’s rule on confidential treatment of public records, Puc 203.08, also recognizes that confidential commercial or financial information may be appropriately protected from public disclosure pursuant to an order of the Commission.

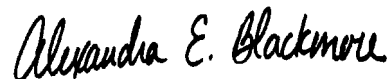
4. National Grid’s request for a protective order is not inconsistent with the public disclosure requirements of the Right-to-Know law, R.S.A. 91-A. This statute generally provides open access to public records, but the Commission has recognized that the determination whether to disclose confidential information involves a balancing of the public’s interest in full disclosure with the countervailing commercial or private interests for non-disclosure. In this instance, the interests in support of a protective order, in addition to those discussed above, include as well the interest of the State in promoting a competitive market for electricity, as expressed in R.S.A. 374-F:1.

WHEREFORE, National Grid respectfully requests that the Commission issue an order protecting the confidential information specified herein from public disclosure.

Respectfully submitted,

Granite State Electric Company d/b/a
National Grid

By its attorney,



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(603) 228-1181

Dated: December 6, 2006

CERTIFICATE OF SERVICE

I certify that I have caused copies of National Grid's Motion for Confidential Treatment to be served on the Office of the Consumer Advocate.

Alexandra E. Blackmore

Alexandra E. Blackmore

Dated: December 6, 2006