

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

RE: ENERGINORTH NATURAL GAS, INC.  
D/B/A NATIONAL GRID NH

WINTER 2009-2010 COST OF GAS

DOCKET NO. DG 09-\_\_

**MOTION FOR PROTECTIVE ORDER  
AND CONFIDENTIAL TREATMENT**

EnergyNorth Natural Gas, Inc. d/b/a National Grid NH ("National Grid") respectfully requests that the Commission issue a protective order regarding certain materials in the above-captioned proceeding. In support of its motion, National Grid states as follows:

1. As part of its filing relating to its Cost of Gas ("COG"), National Grid must submit gas supply contract information to the Commission. In particular, a number of pages of the COG filing and its attachments identify specific suppliers and set forth commodity and demand charges. This information constitutes trade secrets of National Grid and should be protected as confidential commercial information. National Grid does not disclose this information to anyone outside of its corporate affiliates and their representatives.
2. National Grid plans to submit redacted and unredacted copies of its COG filing to the Commission in this proceeding. By this Motion, National Grid is seeking a protective order covering the unredacted copies.
3. The information that National Grid is seeking to protect from disclosure is included in the following portions of its filing, with the confidential portions being removed in the redacted copies of the COG filing:

Schedule 1	Summary of Supply and Demand Forecast
Schedule 2	Contracts Ranked on a per Unit Cost Basis
Schedule 4	Adjustments to Gas Costs
Schedule 5A	Demand Costs
Schedule 5C	Demand Rates
Schedule 6	Commodity Costs
Schedule 7	NYMEX Futures @ Henry Hub and Hedged Contracts
Schedule 16	NYMEX Futures @ Henry Hub and Underground Storage
Tariff Page 153	Attachment B in worksheets showing peaking demand rate calculation

4. Release of the information that National Grid seeks to protect is likely to result in a competitive disadvantage for National Grid in the form of less advantageous or more expensive gas supply contracts. Gas suppliers possessing the confidential information described above would be aware of National Grid's expectations regarding gas supply costs and other contract terms, and would be unlikely to propose to supply such goods and services on terms significantly more advantageous to National Grid.

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. National Grid 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 National Grid. The protective order should also be extended to any discovery, testimony, argument or briefing relative to the confidential information.

WHEREFORE, National Grid respectfully requests that the Commission:

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

Respectfully submitted,

ENERGYNORTH NATURAL GAS, INC. d/b/a  
National Grid NH



By: \_\_\_\_\_  
Thomas P. O'Neill  
Senior Counsel  
40 Sylvan Road  
Waltham, MA 02451

#### 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: September 1, 2009



\_\_\_\_\_  
Thomas P. O'Neill

Via Hand Delivery

September 1, 2009

Debra A. Howland  
Executive Director and Secretary  
New Hampshire Public Utilities Commission  
21 S. Fruit Street, Suite 10  
Concord, NH 03301

**RE: EnergyNorth Natural Gas, Inc. d/b/a National Grid NH  
Winter 2009-2010 Cost of Gas; DG 09-\_\_**

Dear Ms. Howland:

Enclosed for filing with the Commission are an original and six copies of a Motion for Protective Order and Confidential Treatment regarding the Winter 2009-2010 for EnergyNorth Natural Gas Inc. d/b/a National Grid NH. This Motion relates to schedules for the cost of gas filing that will be filed by National Grid NH under separate cover.

A copy of the enclosed Motion is also being filed electronically with the Commission.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Thomas P. O'Neill

TPO/tas

Enclosures

cc: Meredith Hatfield, Esq.  
Ann Leary

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