

State of New Hampshire
Public Utilities Commission

Docket No. DE 19-064

**LIBERTY UTILITIES (GRANITE STATE ELECTRIC) CORP.
d/b/a LIBERTY UTILITIES**

Distribution Service Rate Case

Motion for Protective Order Related to September 1, 2020, Filing

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities, through counsel, respectfully moves the Commission pursuant to Puc 203.08 for a protective order preserving the confidentiality of customer information contained within Table 5 of the Salem Area Study (the “Salem Study”), which the Company is filing on this date in compliance with Order No. 26,337 (July 31, 2020) (the “compliance filing”).

In support of this motion, Liberty represents as follows:

1. The Commission directed Liberty to file, among other information, “a detailed forecast of Tuscan Village and other Salem load with as much detail as needed to support the forecast.” Order No. 26,377 at 11.
2. The Company provided this information in Table 5 of the Salem Study. Table 5 lists the various Tuscan properties by customer name where there is an identified customer, or by description of the property where there is no committed tenant (e.g., “Restaurant 1” or “35 N Broadway”). Table 5 also contains the anticipated load for each property. For those properties with identified tenants, Liberty seeks confidential treatment of the projected load numbers.

3. The load information for the identified customers is confidential customer information specifically protected from disclosure by RSA 363:37, RSA 363:38, and more generally by RSA 91-A:5, IV.
4. The Commission granted a similar motion for confidential treatment of the same Tuscan Village load information contained in Exhibit 51 (confidential) and Exhibit 52 (redacted), that were introduced at the June 22, 2020, hearing on the Company's first step adjustment. Order No. 26,377 at 12. Table 5 is merely an update of that same information. Liberty thus incorporates by reference that prior motion and submits that Order No. 26,377 is controlling as to this motion.
5. Liberty is filing both a confidential and redacted version of the Salem Study, with the appropriate markings on Table 5.

WHEREFORE, Liberty respectfully requests that the Commission:

- A. Grant confidential treatment to the marked information in Table 5 of Attachment A; and
- B. Grant such other relief as is just and equitable.

Respectfully submitted,

Liberty Utilities (Granite State Electric) Corp. d/b/a
Liberty Utilities



Date: September 1, 2020

By: _____

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Certificate of Service

I hereby certify that on September 1, 2020, a copy of this Motion has been electronically forwarded to the service list in this docket.

A handwritten signature in black ink, appearing to read "M. Sheehan", written in a cursive style.

Michael J. Sheehan