



**CONFIDENTIAL
MATERIAL
IN COMM FILE**

NHPUC 31OCT'19AM10:37

October 30, 2019

Via Electronic Mail and Overnight Delivery

Debra A. Howland
Executive Director and Secretary
N.H. Public Utilities Commission
21 South Fruit Street, Suite 10
Concord, N.H. 03301

RE: DG 19-116: Northern Utilities, Inc. Petition for Approval of Precedent Agreements for Westbrook Xpress Phase III Project

Dear Ms. Howland:

In connection with the above-referenced matter I enclose an original and six copies of a Motion for Confidential Treatment in connection with certain discovery requests submitted during the course of this proceeding, as well as the confidential attachment to the Settlement Agreement among the parties filed on October 8, 2019. Please note that the Company seeks confidential treatment for models and formulae in a live excel document attached to the Company's Staff 1-1 response, and as such has not included hard copies of the document as it would not assist in evaluating the confidential nature of the material. Furthermore, the Company's response to Staff 1-2 comprises all discovery filed in a concurrently pending docket in Maine, 2019-00101, including material that is subject to protective orders in that docket. Due to the volume of the responses and the fact that the information has already been accorded confidential treatment in a neighboring jurisdiction, the Company has not included hard copies with this motion. Please do not hesitate to contact me should you have any questions regarding the enclosed materials.

Regards,

A handwritten signature in black ink, appearing to read "Patrick H. Taylor", written over a horizontal line.

Patrick H. Taylor

Cc: Office of the Consumer Advocate

Patrick Taylor
Senior Counsel
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