

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

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

SUMMER 2009 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. National Grid is seeking to protect the following portions of its filing from disclosure pursuant to a protective order to be issued by the Commission:

Schedule 1	Summary of Supply and Demand Forecast
Schedule 2	Contracts ranked on a per Unit Cost Basis
Schedule 5	Detail of Demand Volumes, Costs, Tariff Rates and Cost per Unit
Schedule 6	Detail of Commodity Volumes, costs, Pipeline Tariff Rates and Costs per Unit
Schedule 7	NYMEX Futures @ Henry Hub and Hedged Contracts
Schedule 14	2008 Summer Cost of Gas Reconciliation

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 204.06 and Puc 204.05(b). 6.

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.

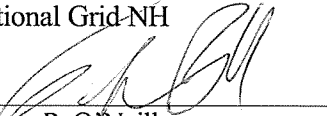
WHEREFORE, National Grid respectfully requests that the Commission:

A. Issue an order protecting the COG filing and responses to data requests 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: 
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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 Meredith A. Hatfield, Esq.

Dated: March 13, 2009


Thomas P. O'Neill