DM 11-156

ORIG1NAL

STATE OF NEW HAMPSHIRE PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Patriot Energy Group, Inc. For a Renewal Registration As a Natural Gas Aggregator

Docket No.

MOTION FOR CONFIDENTIAL TREATMENT

NOW COMES the Petitioner, Patriot Energy Group, Inc. ("PEG"), pursuant to Puc 203.08,

moves and respectfully requests that the Public Utilities Commission ("Commission") grant this Motion for Confidential Treatment ("Motion") with respect to Exhibit "B" to the *Application of Patriot Energy Group, Inc. for a Renewal Registration as a Natural Gas Aggregator*

("Application"), which contains confidential commercial information, specifically, the names of the Competitive Natural Gas Suppliers (CNGS) through which PEG intends to provide service in New Hampshire.

In support of this Motion, PEG submits the following:

1. PEG is a registered natural gas aggregator¹ in New Hampshire seeking renewal of its registration pursuant to Puc 3003.05 via the Application, submitted to the Commission contemporaneously with this Motion.

2. Seven (7) copies of the unredacted version of Exhibit "B" to PEG's Application, containing a list of names of the CNGSs through which PEG intends to provide service in New Hampshire accompany this Motion in a sealed envelope, in order to prevent inadvertent disclosure.

¹ The Commission last renewed PEG's registration by Secretarial Letter, dated August 19, 2009, in Docket DM 09-145.

 The document containing the names of CNGSs consists of "confidential, commercial" information placing it within the exemptions from public disclosure permitted by RSA 91-A:5, IV. Specifically,

4. Ordinarily, PEG would not release the names of its New Hampshire natural gas suppliers through which it provides service, in the aggregate, to anyone outside of PEG. If circumstances warranted disclosure of such information to outside parties, PEG would first require them to sign a non-disclosure agreement placing them under a contractual duty to maintain confidentiality of such information.

5. Public disclosure of PEG's CNGS information would jeopardize PEG's competitive position. Competitors, both actual and potential, would be able to use this information to assess PEG's strengths and weaknesses in the New Hampshire market and gain insight into its operations, that, but for the disclosure requirement in Puc 3006.02(a)(6), they would not ordinarily have.

6. Nondisclosure of PEG's CNGS information would not deprive the citizens of New Hampshire of an informed choice in energy suppliers given the nature of the information, and given the fact that in its Application, PEG states that it does not represent the interests of any supplier.

7. The above form sufficient grounds for the Commission to grant this Motion.WHEREFORE, Patriot Energy Group, Inc. hereby respectfully requests the Commission:

A. GRANT this Motion for Confidential Treatment for Exhibit "B" to PEG's Application, containing a list of natural gas supplier through which PEG provides service;

B. ORDER that such Exhibit "B" is deemed confidential, maintained in a secure location within the Commission's offices, and protected at all times from public disclosure; and

C. GRANT any other relief as may be necessary and just.

Respectfully Submitted, PATRIOT ENERGY GROUP, INC. By the undersigned,

Dated: July 14, 2011

Matthew T. Kinney Counsel 1 Rounder Way Suite 200 Burlington, MA 01803 (781) 376-1888 x202 (phone) (781) 376-0519 (fax) mkinney@patriotenergygroup.com