

State of New Hampshire
Public Utilities Commission

DG 17-048

Liberty Utilities (EnergyNorth Natural Gas) Corp.

Motion for Confidential Treatment and Protection from Public Disclosure

NOW COMES the Staff of the Public Utilities Commission, pursuant to Puc Rule 203.08, requesting Confidential Treatment and Protection from Public Disclosure of four data points in Attachment 8 to the Testimony of Stephen P. Frink, filed in this docket on November 30, 2017.

In support of this Motion, Staff states as follows:

1. On November 30, 2017, Staff submitted the testimony of Stephen P. Frink concerning the Staff's recommended revenue requirement in this docket. Attachment 8 to Mr. Frink's testimony is a report from The Liberty Consulting Group (LCG), which addresses the performance of Liberty Utilities' Customer Care Department.

2. Specifically, the LCG Report, at Bates p. 87 of the Frink Attachment 8, contains four employee engagement survey scores for Liberty Utilities' Customer Care Department. Two of the scores were redacted from the Frink Attachment 8 filed November 30 and two of the scores, inadvertently, were not.

3. In Data Response, Staff 6-38, which also addresses these employee engagement scores, Liberty Utilities requested confidential treatment of the scores by asserting the following:

Confidential Attachment Staff 6-8 contains information pertaining to internal personnel practices and otherwise confidential information. Therefore, pursuant to RSA 91-A:5, IV, and Puc 203.08(d), the Company has a good faith basis to seek confidential treatment of this information, and will submit a motion seeking confidential treatment prior to the final hearing in this docket.

4. Consistent with Liberty Utilities' position as expressed in Response Staff 6-8 quoted above, Staff requests confidential treatment and protection from public disclosure of the four Customer Care Department employee engagement scores that are contained in the Frink Attachment 8 at Bates p. 87. Staff requests such treatment to maintain confidentiality until Liberty Utilities files, and the Commission rules on, the motion Liberty Utilities states it will file concerning its Data Response Staff 6-8.
5. With this Motion, Staff provides seven copies of the Frink Attachment 8 in its complete form and one redacted version (with the four scores blacked out). Staff requests that only the redacted version of Attachment 8 provided herewith be disclosed to the public and that the complete version, which now alerts readers to the confidential information on Bates p. 87, be substituted for the version provided on November 30, 2017.

WHEREFORE, for the reasons set forth herein, Staff of the New Hampshire Public Utilities Commission respectfully requests that the New Hampshire Public Utilities Commission:

- I. Provide confidential treatment and protection from public disclosure of four data points contained on Bates p. 87 of Attachment 8 of the Testimony of Stephen P. Frink, filed in this matter on November 30, 2017. Staff seeks such protection until the Commission rules on a motion that Liberty Utilities plans to file prior to the final hearing in this docket.

- II. Use the version of Attachment 8 provided herewith in place of the version provided on November 30th; and

- III. Grant other relief as it deems appropriate.

Respectfully Submitted,

Staff of the Public Utilities Commission

By its Attorney



Paul B. Dexter, Esq.
NHPUC Staff Attorney
21 S. Fruit St., Suite 10
Concord, NH 03301

Dated: January 8, 2018