

**STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION**

**Docket No. DE 17-\_\_\_**

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

**Petition to Approve Battery Storage Pilot Program**

**Motion for Confidential Treatment Related to Appendix 1**

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty Utilities (the “Company” or “Liberty”), through counsel, respectfully moves the Commission for confidential treatment of certain information in Appendix 1 to Ms. Tebbetts’ testimony because that information is “confidential, commercial, or financial information” protected from disclosure pursuant to RSA 91-A:5, IV.

In support of this motion, the Company states as follows:

1. Liberty has this date filed a petition asking the Commission to approve a battery storage pilot program. Appendix 1 to Ms. Tebbetts’ testimony is a business case prepared by Alectra Energy Services, a consultant that will assist Liberty throughout this docket. Alectra’s report includes comparisons of products, features, and prices from different potential vendors.
2. Liberty has not yet selected a vendor to supply the batteries and related equipment.
3. The vendors provided their information to Alectra on condition of confidentiality since disclosure could adversely affect their business positions in the future.
4. The Commission routinely treats as confidential such product information and pricing from potential vendors, who, in this case, are in a similar position as bidders in an RFP. *See Granite State Electric, Order No. 25,338 (Mar. 27, 2012) (Commission granted confidential*

treatment “to the RFP bid evaluation, a comparison of changes in electric and gas futures costs to changes in power procurement costs, the calculation of commodity costs at retail”). Indeed, in the context of default service proceedings, Puc 201.06(a)(15) presumes confidential treatment of “default service solicitations, “bidder information,” and “bid evaluations.”

5. The same protection should be afforded to those vendors who participated in an informal RFP process as documented in Alectra’s business case, Appendix 1.

WHEREFORE, Liberty respectfully asks that the Commission:

- A. Grant this motion for confidential treatment as to the information highlighted in the confidential version, and redacted in the public version, of Appendix 1; and
- B. Grant such other relief as is just and reasonable and consistent with the public interest.

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



Date: November 30, 2017

By: \_\_\_\_\_  
Michael J. Sheehan, Senior Counsel #6590  
15 Buttrick Road  
Londonderry, NH 03053  
Telephone (603) 216-3635  
[michael.sheehan@libertyutilities.com](mailto:michael.sheehan@libertyutilities.com)

Certificate of Service

I hereby certify that on November 30, 2017, a copy of this motion has been forwarded to the Office of Consumer Advocate.



By: \_\_\_\_\_  
Michael J. Sheehan