

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

**RE: GRANITE STATE)
ELECTRIC COMPANY)
DEFAULT SERVICE)
RATES FOR NOVEMBER)
1, 2006 THROUGH)
JANUARY 31, 2007 AND)
NOVEMBER 1, 2006)
THROUGH APRIL 30,)
2007)**

DOCKET NO. DE 06-115

MOTION FOR CONFIDENTIAL TREATMENT

To the Public Utilities Commission:

NOW COMES Granite State Electric Company d/b/a National Grid (“National Grid” or “Company”) and hereby moves pursuant to N.H. Code of Administrative Rules Puc 203.04 and 204.06 for confidential treatment by the Commission with respect to the power supply agreements between National Grid and the winning suppliers, Sempra Energy Trading Corporation (“Sempra”) to provide Default Service for the period November 1, 2006 through January 31, 2007 and TransCanada Power Marketing, Limited (“TCPM”) to provide Default Service for the period November 1, 2006 through April 30, 2007. The Company also requests confidential treatment for its summary of the RFP bid evaluation and for its analysis comparing changes in electric and gas futures costs to changes in procurement costs. In support of this Motion, National Grid states as follows:

1. National Grid and Sempra entered into an agreement whereby Sempra committed to provide, among other things, service to National Grid’s Large Customer Group Default Service load for the period November 1, 2006 through January 31, 2007.

2. National Grid and TCPM entered into an agreement whereby TCPM committed to provide, among other things, service to National Grid's Small Customer Group Default Service load for the period November 1, 2006 through April 30, 2007.

3. The contracts with Sempra and TCPM and the RFP bid evaluation, as well as the Company's analysis comparing futures costs are being provided as separate schedules to the testimony of Mr. Warshaw in the above-referenced docket.

4. The contracts, the RFP bid evaluation and the analysis comparing futures costs contain competitive energy pricing and contract terms which are commercially sensitive, the disclosure of which could be harmful to the competitive positions of Sempra and TCPM and participants in the RFP which could chill the willingness of these suppliers to participate in providing energy services in New Hampshire in the future. In negotiating power supply contracts in New Hampshire, competitive suppliers are sensitive to the protection of information they deem confidential or commercially sensitive. The parties have taken steps to avoid disclosure of this information and the disclosure of such information could adversely affect the business position of the parties in the future.

5. N.H. Code of Administrative Rules Puc 204.06(a) provides in pertinent part that "the Commission shall grant confidentiality upon its finding that the documents sought to be made confidential are within the exemptions permitted by RSA 91-A:5, IV or other provisions of law based upon the information submitted pursuant to Puc 204.06(b) and (c)."

6. Documents exempted from public disclosure under RSA 91-A:5, IV include "records relating to...confidential, commercial, or financial information...." In addition, RSA 91-A:5, IV exempts from public disclosure "other files whose disclosure would constitute an invasion of privacy."

7. As the Commission has previously recognized in Order Nisi No. 24,000 (June 27, 2002) as well as Order No. 23,486 (May 22, 2000), Order Nisi No. 23,681 (April 19, 2001), Order Nisi No. 23,834 (November 2, 2001), and Order No. 24,412 (December 22, 2004), the information contained within the wholesale power contracts for Default Service is “confidential, commercial, or financial information” and that disclosure of such information could adversely affect the business position of the parties in the future. The same rationale for protecting the contracts from public disclosure applies equally to the information contained within the RFP bid evaluation and in the Company’s analysis comparing futures costs.

8. The contracts with Sempra and TCPM, the RFP bid evaluation and the Company’s analysis comparing futures costs provided as schedules to the testimony of Mr. Warshaw, qualify for confidential treatment under State law and Commission rules and as such should be protected.

WHEREFORE, National Grid respectfully requests that the Commission grant confidential treatment for the contracts with Sempra and TCPM, the RFP bid evaluation and for the Company's analysis comparing futures costs provided as schedules to the testimony of Mr. Warshaw in this docket. In accordance with N.H. Code of Administrative Rules Puc 204.06(d), this information should, at minimum, be labeled "Confidential," held in a secure location within the Commission's offices, and not disclosed to the public or any of the parties in this proceeding other than the Commission staff without National Grid's consent.

Respectfully submitted,

GRANITE STATE ELECTRIC COMPANY
By its attorneys,

Alexandra E. Blackmore

September 25, 2006

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CERTIFICATE OF SERVICE

I certify that an electronic copy of the foregoing Motion for Confidential Treatment has been served this date to the Office of the Consumer Advocate and to the parties named on the Service List in this proceeding.

Alexandra E. Blackmore

September 25, 2006

Alexandra E. Blackmore