

THE STATE OF NEW HAMPSHIRE
before the
PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire
Long Range Plan for Bulk Power Supply Facilities
Docket No. DE 08-056

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S
REQUEST FOR WAIVER

Pursuant to NH Code Admin. Rule Puc § 201.05, Public Service Company of New Hampshire ("PSNH") hereby requests a waiver of NH Code Admin. Rule §309.01(c)(3). That rule requires PSNH to file with its Long Range Plans for Bulk Power Supply Facilities ("Bulk Power Supply Plan") an attachment to Form B "which shall show the general location of the transmission line on the United States Geological Survey sheet". PSNH is proposing to supply an alternative map.

In past Bulk Power Supply Plan filings, PSNH has provided photocopies of portions of the United States Geological Survey ("USGS") topographic maps. This approach only provided a piecemeal approach to depicting the path of each of the planned transmission lines contained in the Bulk Power Supply Plan. In order to see the intended path of the entire project, the photocopies needed to be placed side by side and aligned to trace the project from the beginning point to the end point.

Staff and PSNH consulted on an alternative map which would better portray all of the transmission projects on a single, large map. The alternative map is enclosed herewith. This topographic map was prepared by the DeLorme Company of Yarmouth, Maine. Each project listed in Form B of PSNH's Bulk Power Supply Plan is shown on the map. PSNH believes the alternative better displays the projects in Form B than photocopies of the USGS maps.

As explained in the cover letter to the 2008 filing, PSNH originally planned to file these maps under a Motion for Protective order pursuant to Rule Puc §203.08. PSNH has determined that the maps contained herein do not constitute Critical Energy Infrastructure Information ("CEII") as described in the

Code of Federal Regulations. Documents may be submitted to the FERC with a designation of CEII under some circumstances 18 CFR 388.112,(b)(1,), and those documents will not be considered public documents under the federal Freedom of Information Act. 5 USC 552. In assessing whether the map contained CEII, PSNH considered the standard in 18 CFR 388.113 (c)(1)(iv)

(1) *Critical energy infrastructure* information means specific engineering, vulnerability or detailed design information about proposed or existing critical infrastructure that:

(i) . . . (iii)

(iv) Does not simply give the general location of the critical infrastructure.

PSNH believes the enclosed maps merely depict the general location of critical infrastructure. Under the federal regulations the maps would not have been protected from public disclosure. There is no independent standard for protecting this information under the Commission's regulations or the New Hampshire analogous statute, RSA 91-A; therefore, PSNH did not request protective treatment in this filing.

WHEREFORE, PSNH respectfully requests the Commission to grant its request for waiver of Rule Puc 309.01(c)(3) and order such further relief as may be just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire

July 10, 2008
Date

By: Gerald M. Eaton

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CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached Request for Waiver to be hand delivered or sent by First Class U.S. Mail, postage prepaid, to the persons listed on the attached cover letter.

July 10 2009
Date

Gerald M. Eaton
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