

THE STATE OF NEW HAMPSHIRE  
before the  
PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire  
Default Energy Service Rate

Docket No. DE 08-113

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S  
MOTION FOR PROTECTIVE ORDER RE: MAJOR MAINTENANCE SCHEDULE

Pursuant to RSA 91-A:5,(IV)(Supp.) and N.H. Code Admin. Rules Puc § 203.08, Public Service Company of New Hampshire ("PSNH" or the "Company") hereby requests protective treatment for the response to a data request propounded by the Staff. The response contains the dates and duration of planned maintenance outages at PSNH's major generating stations during 2009 the upcoming Default Energy Service period. In support of its Motion for Protective Order, PSNH says the following:

1. The data request is as follows:

**NSTF-01 Q- STAFF-008**

**Question:**

Reference Attachment RAB-2, page 3. Please provide a schedule, by generating unit, of the planned maintenance outages during the twelve month ES period. Please include a description of the work to be performed as well as the estimated costs and duration of each outage.

The response contains a schedule of the weeks when the planned outages are scheduled to take effect with the precise days when the outage is planned to begin and end. PSNH submits this information to the Independent System Operator for New England (ISO New England); however, this information is kept confidential and not shared with the public or other participants.

2. The Commission must use a balancing test in order to weigh the importance of keeping the record public with the harm from disclosure of confidential plans for scheduled maintenance activities. Clearly the harm outweighs the need for public disclosure or providing this response to the interveners in this proceeding.

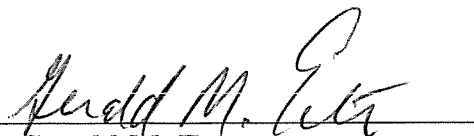
3. Release of this information to the public, including competitive market participants, places PSNH at a distinct disadvantage when it plans to purchase energy to supply its customers during times when major generating stations are undergoing planned maintenance. This disadvantage persists as long as PSNH is supplying Default Energy Service and as long as PSNH owns generation. This disadvantage would harm PSNH's customers directly, as PSNH should always be in a position to negotiate at arms length to purchase replacement power at the lowest possible cost. A similar motion was granted in the previous Default Energy Service rate setting docket DE 07-096. Order No. 24,814, slip op. at 20 (December 28, 2007).

WHEREFORE PSNH respectfully requests the Commission issue an order preventing the public disclosure of the response to NSTF-01, Q-STAFF-008 to and to order such further relief as may be just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire

October 23, 2008  
Date

By:   
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## CERTIFICATE OF SERVICE

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

October 23, 2006  
Date

Gerald M. Eaton  
Gerald M. Eaton