

STATE OF NEW HAMPSHIRE  
BEFORE THE  
PUBLIC UTILITIES COMMISSION

RE: ENERGYNORTH NATURAL GAS, INC.  
D/B/A NATIONAL GRID NH

SUMMER 2011 COST OF GAS

DOCKET NO. DG 11-\_\_

**MOTION FOR PROTECTIVE ORDER  
AND CONFIDENTIAL TREATMENT**

EnergyNorth Natural Gas, Inc. d/b/a National Grid NH (“National Grid NH”) requests that the Commission issue a protective order regarding certain materials in the above-captioned proceeding. In support of its motion, National Grid NH states as follows:

1. As part of its filing relating to its Cost of Gas (“COG”), National Grid NH must submit gas supply contract information to the Commission. In particular, a number of pages of the COG filing and its attachments identify specific suppliers and set forth commodity and demand charges. This information constitutes trade secrets of National Grid NH and should be protected as confidential commercial information. National Grid NH does not disclose this information to anyone outside of its corporate affiliates and their representatives.

2. Contemporaneously with the filing of this motion, National Grid NH is submitting to the Commission redacted and unredacted copies of its COG filing. By this motion, National Grid NH is seeking a protective treatment order covering the unredacted copies.

3. National Grid NH is seeking to protect the following portions of its filing from disclosure pursuant to a protective order to be issued by the Commission:

Schedule 1	Summary of Supply and Demand Forecast
Schedule 2	Contracts Ranked on a per Unite Cost Basis
Schedule 4	Adjustment to Gas Costs
Schedule 5A	Demand Costs
Schedule 5C	Demand Rates
Schedule 6	Commodity Costs
Schedule 7	NYMEX Futures @ Henry Hub and Hedged Contracts

4. Release of the information that National Grid NH seeks to protect is likely to result in competitive disadvantage for National Grid NH in the form of less advantageous or more expensive gas supply contracts. Gas suppliers possessing the confidential information described above would be aware of National Grid NH's expectations regarding gas supply costs and other contract terms, and would be unlikely to propose to supply such goods and services on terms significantly more advantageous to National Grid NH.

5. RSA 91-A:5, IV expressly exempts from the public disclosure requirements of Chapters 91-A any records pertaining to "confidential, commercial or financial information." The Commission has the authority to protect the information described above pursuant to N.H. code of Admin. Rules Puc 204.06 and Puc 204.05(b).

6. National Grid NH requests that the Commission issue a protective order granting this motion and protecting from public disclosure the confidential commercial information described above. Copying, duplication, dissemination or disclosure in any form should be prohibited and the protected materials should be returned at the conclusion of the proceeding or destroyed on terms acceptable to National Grid NH. The

protective order should also be extended to any discovery, testimony, argument or briefing relative to the confidential information.

WHEREFORE, National Grid NH respectfully requests that the Commission:

- A. Issue an order protecting the COG filing and responses to data requests containing the information described above and other information of the same nature; and
- B. Grant such other and further relief as may be just and equitable.

Respectfully submitted,

ENERGYNORTH NATURAL GAS, INC.  
D/B/A NATIONAL GRID NH



By: \_\_\_\_\_

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#### CERTIFICATE OF SERVICE

I hereby certify that a copy of this Motion for Protective Order and Confidential Treatment has been forwarded to Meredith A. Hatfield, Esq.

Dated: March 15, 2011

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Thomas P. O'Neill