

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

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

SUMMER 2012 COST OF GAS

DOCKET NO. DG 12-___

**MOTION FOR PROTECTIVE ORDER
AND CONFIDENTIAL TREATMENT**

EnergyNorth Natural Gas, Inc. d/b/a National Grid NH respectfully 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") rates, National Grid NH must submit gas supply contract information to the Commission. In particular, a number of pages of the COG filing identify specific suppliers and set forth commodity and demand charges, or such information can be determined from the data provided. 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, without sufficient legal protections in place.

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

3. The information that National Grid NH is seeking to protect from disclosure is included in the following portions of its filing, with the confidential portions being removed in the redacted copies of the COG filing:

Schedule 1	Summary of Supply and Demand Forecast
Schedule 2	Contracts Ranked on a per Unit Cost Basis
Schedule 5A	Demand Costs
Schedule 5C	Demand Rates
Schedule 6	Commodity Costs
Schedule 7	NYMEX Futures @ Henry Hub and Hedged Contracts
Schedule 14	2011 Summer Period Cost of Gas Reconciliation

4. Release of the information that National Grid 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 Chapter 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 203.08.

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. 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 as described above; 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 Its Attorneys

McLANE, GRAF, RAULERSON &
MIDDLETON, P.A.

Date: March 15, 2012

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 the Office of the Consumer Advocate.

Dated: March 15, 2012



Steven V. Camerino