

THE STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION

Liberty Utilities (Granite State Electric) Corp.
d/b/a Liberty

Docket No. DE 21-____

Least Cost Integrated Resource Plan

Motion for Confidential Treatment

Liberty Utilities (Granite State Electric) Corp. d/b/a Liberty, through counsel, respectfully moves the Commission to grant confidential treatment of system drawings contained in an attachment to the Least Cost Integrated Resource Plan (“LCIRP”) filed this date.

In support of this motion, Liberty represents as follows:

1. Attachment G to Liberty’s LCIRP, the “Bellows Falls Area, System Planning Summary 2020,” contains line drawings of the Company’s system in the Bellows Falls area. The pages are titled, “Bellows Falls Supply System,” “Bellows Falls 13.2 kV Distribution System,” and “Bellows Falls 115 kV Transmission System.” *See* Attachment G, at 22–25.
2. RSA 91-A:5, IV, protects these drawings from disclosure as “confidential, commercial, or financial information.”
3. The drawings also fall under the spirit, if not the precise letter, of the exemption in RSA 91-A:5, VI, which protects from disclosure those materials “pertaining to matters relating to the preparation for and the carrying out of all emergency functions... that are directly intended to thwart a deliberate act that is intended to result in widespread or severe

damage to property or widespread injury or loss of life.” The intent of this subsection is to keep certain information from those who intend harm. Although the drawings at issue here do not precisely fit the exemption, the Company guards its confidentiality for that reason.

4. In *New Hampshire Regulated Utilities*, Order No. 25,457 at 8 (Jan. 18, 2013), the docket through which the Commission reviewed the electric utilities’ response to the October 2011 Snowstorm, PSNH sought confidential treatment of “system circuit maps by Area Work Center” that were provided during discovery. Order 25,457 at 4. Similarly, Unitil sought protection of,

the circuit diagrams provided in response to data request 2-28, contending that the diagrams should be protected from public disclosure because they provide specific details concerning UES’s energy infrastructure, including the precise location of key facilities and detailed information as to how the UES’s distribution system is designed and configured.

Id. at 6. Unitil argued, among other things, that “extreme care must be exercised to protect sensitive information regarding the location of critical electric distribution infrastructure from unnecessary public disclosure, in this age of increased vigilance against potential acts of terrorism and sabotage.” *Id.*

5. The Commission granted confidential treatment of the PSNH and Unitil information described above pursuant to RSA 91-A:5, IV:

We further find that the system circuit maps submitted by PSNH and UES contain certain sensitive commercial information that warrants protection. We find that public disclosure of the information will not materially advance the public’s understanding of the Commission’s analysis of electric utility performance during the October 2011 snowstorm event and, moreover, could result in commercial harm or pose legitimate security risks.

Order No. 25,457 at 8.

6. For the reasons stated in Order No. 25,457, and pursuant RSA 91-A:5, IV, Liberty similarly seeks confidential treatment of the system drawings described above.

WHEREFORE, Liberty respectfully asks the Commission to:

- a. Grant confidential treatment to the line drawings that appear at pages 22-25 of Attachment G to the LCIRP;
- b. Grant any further relief deemed just and proper.

Respectfully submitted,
Liberty Utilities (Granite State Electric) Corp.
By its Attorney,



Date: January 14, 2021

By: _____
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Certificate of Service

I hereby certify that on January 14, 2021, a copy of this motion has been electronically forwarded to the Office of the Consumer Advocate.



By: _____
Michael J. Sheehan