

THE STATE OF NEW HAMPSHIRE  
before the  
PUBLIC UTILITIES COMMISSION

Public Service Company of New Hampshire  
Least Cost Integrated Resource Plan

Docket No. DE 07-108

PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE'S  
MOTION FOR CONFIDENTIAL TREATMENT OF SUPPLY SIDE WORK  
PAPERS

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 confidential treatment for the response to a data request propounded by the Staff. The response is composed of work papers containing data supporting PSNH's supply side strategies. PSNH is specifically seeking protection for the analysis and data behind the generation resources PSNH has included in its Least Cost Integrated Resource Plan in response to the data request TS-01, Q-TS-001. PSNH further requests that access to this confidential information be provided to the Staff and the Office of Consumer Advocate and supplied to the other intervenors provided they execute a non-disclosure agreement. In support of its Motion for Confidential Treatment, PSNH says the following:

1. The data request is as follows:

**TS-01 Q-TS-001**

**Question:**

Please provide the detailed work papers that support the revenue requirements and market purchases presented in Exhibits V-16 through 20 at pages 94-96 of the filing. The response should also identify and support all assumptions. To the extent different, please also provide the detailed work papers that support Exhibits G-1 and G-2 on pages 156-157.

2. In the previous Least Cost Integrated Resource Plan proceeding for PSNH (Docket No. DE 04-172), the Commission determined that PSNH should include the study of possible generation resources in its next least cost plan. PSNH did include

generation options in the plan that was filed on September 30, 2007 and is currently being reviewed in this proceeding. In the final order in the previous proceeding, the Commission stated:

We therefore find it appropriate for PSNH to include generic cost information regarding the construction or acquisition of new generation capacity in its next LCIRP. . . . However, to the extent that PSNH suggests or advocates a change in the law that would allow it to build or acquire new generation, PSNH must demonstrate that the resources that it plans to add to its portfolio will satisfy customers' energy service needs at the lowest overall cost. Supply-side resource options shall be evaluated based on net present value of revenue requirements, expressed in dollars in the year the plan is filed. Order No. 24,695 at 24-25 (November 8, 2006).

3. This proceeding is designed to evaluate PSNH's planning process. PSNH is not currently seeking pre-approval of a specific generation proposal or asking for a prudence determination on the acquisition or construction of a generating resource. The data supporting the generation resources described in the plan were the result of significant effort by many individuals throughout the Company. Reproduction of this material would be very time consuming and involve substantial resources. PSNH does not routinely make this information readily available.

4. PSNH requests that the confidential information be restricted to persons actively involved in this proceeding and that the information not be disclosed to anyone outside of this proceeding. PSNH further requests that the Commission order that the confidential information described in this motion may not be used in a discussion or proceeding in any future forum in the event that PSNH seeks authority to acquire generating resources or proposes an actual generating project to be built or acquired. The intervenors in this proceeding may well be competitors of PSNH in the development of future supply side resources including generation. In the interest of providing the intervenors an adequate opportunity to participate in this proceeding, PSNH is willing to allow access to the confidential information

as long as it is not used elsewhere, thereby putting PSNH at a competitive disadvantage.

5. The Commission must use a balancing test in order to weigh the importance of keeping open the record of this proceeding with the harm from disclosure of confidential financial or competitive information.

“Under administrative rule Puc 204.06, the Commission considers whether the information, if made public, would likely create a competitive disadvantage for the petitioner; whether the customer information is financially or commercially sensitive, or if released, would likely constitute an invasion of privacy for the customer; and whether the information is not general public knowledge and the company takes measures to prevent its' dissemination.” *Re Northern Utilities, Inc.*, 87 NH PUC 321, 322, Docket No. DG 01-182, Order No. 23,970 (May 10, 2002).

WHEREFORE PSNH respectfully requests the Commission issue an order preventing the public disclosure of the response to TS-01, Q-TS-001 to restrict any disclosure of the response to persons actively participating in this proceeding and to order such further relief as may be just and equitable.

Respectfully submitted,

Public Service Company of New Hampshire

April 7, 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 Motion for Confidential Treatment to be hand delivered or sent pursuant to N.H. Code Admin. Rule Puc §203.02, to the persons listed on the attached Service List.

April 7, 2008  
Date

Gerald M. Eaton  
Gerald M. Eaton

Witness: Terrance J. Large  
Request from: **New Hampshire Public Utilities Commission Staff**

**Question:**

Please provide the detailed work papers that support the revenue requirements and market purchases presented in Exhibits V-16 through 20 at pages 94-96 of the filing. The response should also identify and support all assumptions. To the extent different, please also provide the detailed work papers that support Exhibits G-1 and G-2 on pages 156-157.

**Response:**

Please see the attachment which provides the detailed work papers supporting the revenue requirements and market purchases presented in Exhibits V-16 through V-20. These work papers include support for Exhibits G-1 and G-2. In addition, the work papers that support Exhibit G-3 are also included.

\*\* The requested information is considered BULK and will be filed under the Motion for Protective Order dated April 7, 2008. The information will be made available only to signatories of the nondisclosure agreement.