

STATE OF NEW HAMPSHIRE
BEFORE THE
PUBLIC UTILITIES COMMISSION

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

WINTER 2008-09 COST OF GAS

DOCKET NO. DG 08-____

**MOTION FOR PROTECTIVE ORDER
AND CONFIDENTIAL TREATMENT**

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

1. As part of its filing relating to its Cost of Gas ("COG"), National Grid 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, or such information can be determined from the data provided. This information constitutes trade secrets of National Grid and should be protected as confidential commercial information. National Grid does not disclose this information to anyone outside of its corporate affiliates and their representatives.

2. National Grid plans to submit redacted and unredacted copies of its COG filing to the Commission in this proceeding. By this Motion, National Grid is seeking a protective order covering the unredacted copies.

3. The information that National Grid 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 4	Adjustments to Gas Costs
Schedule 5A	Demand Costs
Schedule 5C	Demand Rates
Schedule 6	Commodity Costs
Schedule 7	NYMEX Futures @ Henry Hub and Hedged Contracts
Tariff Page 153	Attachment B in worksheets showing peaking demand rate calculation

4. Release of the information that National Grid seeks to protect is likely to result in competitive disadvantage for National Grid 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'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.

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

WHEREFORE, National Grid 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.

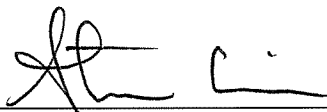
Respectfully submitted,

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

By Its Attorneys

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

Date: August ~~25~~²⁸, 2008

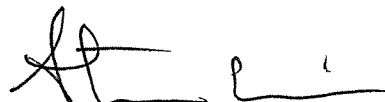
By: 

Steven V. Camerino, Esq.
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Concord, NH 03301

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: August 28, 2008



Steven V. Camerino