

**STATE OF NEW HAMPSHIRE BEFORE THE  
PUBLIC UTILITIES COMMISSION**

**Concord Steam Corporation Cost of Energy  
DG 14-233**

Concord Steam Corporation's Motion for Protective Order  
re: Status report

Pursuant to RSA 91 – A:5, IV, and New Hampshire Code Admin. Rules Puc 203.08, Concord Steam Corporation (Company) hereby requests protective treatment for the response to a data request in the above captioned matter. The information is confidential financial and business information and should be protected from public disclosure.

In support of its motion for protective order, the Company says the following:

1. The commission order 25-728 states as follows:

**FURTHER ORDERED**, that Concord Steam shall file a status report with the Commission regarding its new plant proposal, current operations, and future business plans, each quarter, beginning with a report to be filed on January 9, 2015, and interim reports at any time a significant development regarding these matters takes place.

2. The future business plans the Company has described in its report are not definite and are still being developed and contract negotiations are still underway. The premature release of these plans could be detrimental to the Company's interests. Customers, employees, and the competition could react negatively to this information and damage the Company.

3. The Commission must use a balancing test in order to weigh the importance of creating an open record of this proceeding with the harm from disclosure of confidential, financial or competitive information. "Under administrative rule Puc §204.06 [predecessor to Puc §203.08], 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).

4. The Company could suffer negative effects should the confidential information contained in its quarterly report be made public. The negotiations for financing and the power purchase agreement could be affected negatively. This information is not disclosed publicly outside of the Company.

Wherefore Concord Steam Corporation respectfully requests the Commission issue an order preventing the public disclosure of response to the above listed data request, to prevent dissemination of the confidential materials, and to order such further relief as may be just and equitable.

Respectfully submitted,  
Concord Steam Corporation

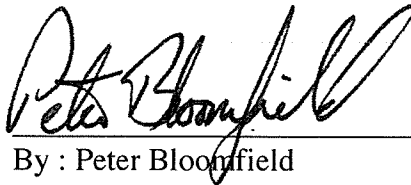


9/24/15

Peter Bloomfield  
President

#### CERTIFICATE OF SERVICE

I hereby certify that, on the date written below, I caused the attached motion for protective order and petition for waiver to be served pursuant to N.H. Code Admin. Rules Puc 203.11.

  
By : Peter Bloomfield

9/24/2015  
Date