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June 3, 2025

Ms. Stephanie De La Rosa  
Clerk  
State of Rhode Island  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

***RE: Narragansett Bay Commission – Docket 24-41-WW – General Rate Filing***

Dear Ms. De La Rosa:

Enclosed please find an original and nine copies of the following:

1. The Narragansett Bay Commission's Motion For Protective Treatment Of Confidential Information.

Please note that an electronic copy of this filing has been provided to the service list. Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosures

cc: Service List (via electronic mail)

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**

**IN RE: NARRAGANSETT BAY COMMISSION**

**DOCKET NO.: 24-41-WW**

**THE NARRAGANSETT BAY COMMISSION'S MOTION FOR PROTECTIVE TREATMENT OF  
CONFIDENTIAL INFORMATION**

**I. INTRODUCTION**

Now comes the Narragansett Bay Commission ("NBC") and hereby requests that the Rhode Island Public Utilities Commission ("Commission") provide confidential treatment and grant protection from public disclosure of certain confidential information. NBC makes this request pursuant to Commission Rule 1.3.H and RIGL §38-2-1, et. seq.

**II. FACTS**

On , November 27, 2024, NBC responded to the First Set of Data Requests issued by the Rhode Island Division of Public Utilities and Carriers ("Division"). NBC's responses included redacted attachments to Division Data Requests DIV 1-27, 29, 44, 45, 46, 47, 48, and 63. These redactions removed identifiable customer account information.

**III. BASIS FOR CONFIDENTIALITY**

Commission Rule 1.3.H provides that access to a public record shall be granted in accordance with the Access to Public Records Act ("APRA"), RIGL §38-2-1, et seq. Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be a "public record," unless the information set forth in the documents and materials falls within one of the enumerated exceptions identified in RIGL §38-2-2(4). As such, the Commission has the authority under the APRA to protect such information from public disclosure and deem it

confidential provided it falls within one of the specific exceptions to the APRA. A review of RIGL §38-2-2(4)(B) indicates that the following records are not deemed to be public:

“Trade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature.”

In addition, it has been held that certain identifiable customer information is confidential. (See *Patacsil v. Narragansett Bay Commission, et. al.*, Attorney General Public Records Decision, PR 21-18) The redacted responses referenced hereinabove remove confidential identifiable customer information and should be treated as confidential.

#### **IV. CONCLUSION**

For the reasons set forth herein, the Narragansett Bay Commission hereby requests that the Rhode Island Public Utilities Commission grant the relief sought herein and grant protective and confidential treatment to the information produced in response to Division Data Requests 1-27, 29, 44, 45, 46, 47, 48, and 63.

The Narragansett Bay Commission,  
By its attorney,



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### **CERTIFICATION**

I hereby certify that on June 3, 2025 I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Stephanie De La Rosa, Commission Clerk, by electronic mail and hand delivery.

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