



Raquel J. Webster  
Senior Counsel

March 10, 2015

**BY HAND DELIVERY AND ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket 4539 - National Grid's Proposed FY 2016 Electric Infrastructure, Safety,  
and Reliability Plan  
Update on Vegetation Management Costs**

Dear Ms. Massaro:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

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FY 2016 Electric ISR Plan  
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■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

[REDACTED]

Pursuant to PUC Rule 1.2(g) and R.I. Gen. Laws § 38-2-2(4)(B), the Company respectfully requests that the information contained in this letter be kept confidential. I have enclosed a motion for confidential treatment in accordance with PUC Rule 1.2(g).

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

cc: Docket 4539 Service List  
Leo Wold, Esq.  
Steve Scialabba, Division  
Greg Booth, Division

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**  
**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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**FY 2016 Proposed Electric ISR Plan**

**Docket No. 4539**

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**NATIONAL GRID'S MOTION FOR PROTECTIVE TREATMENT  
OF CONFIDENTIAL INFORMATION**

Pursuant to the Rhode Island Public Utilities Commission (PUC) Rule 1.2(g) and R.I. Gen. Laws § 38-2-2(4)(B), National Grid<sup>1</sup> respectfully requests that PUC provide confidential treatment and grant protection from public disclosure the confidential letter the Company submitted in this proceeding on March 10, 2015 regarding an update on vegetation management costs (March 10 Letter). National Grid also respectfully requests that, pending entry of that finding, the PUC preliminarily grant National Grid's request for confidential treatment pursuant to Rule 1.2 (g)(2).

**I. BACKGROUND**

On March 10, 2015, National Grid filed with the PUC a letter that provided the PUC with an update on vegetation management costs. National Grid respectfully requests that the PUC afford confidential treatment to the March 10 Letter because it includes details regarding National Grid's confidential strategy.

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

## II. LEGAL STANDARD

The PUC's Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1 *et seq.* Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency is considered a "public record" unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws. § 38-2-2(4). Therefore, to the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of the APRA to treat such information as confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws. § 38-2-2(4)(B) provides that the following types of records shall not be deemed public:

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

The Rhode Island Supreme Court has held that this confidential information exemption applies where disclosure of information would likely either (1) impair the Government's ability to obtain necessary information in the future; or (2) cause substantial harm to the competitive position of the person from whom the information was obtained. Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001).

The first prong of the test is satisfied when information is provided voluntarily to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47.

**III. BASIS FOR CONFIDENTIALITY**

The details in the March 10 Letter are confidential and, disclosure of those details would have serious adverse effects on National Grid's current strategy relating to the matters set forth in the letter. As such, National Grid believes that the March 10 Letter satisfies the test for exceptions to the APRA and, therefore, warrants protection from public disclosure.

**IV. CONCLUSION**

Accordingly, the Company respectfully requests that the PUC grant protective treatment to the March 10, 2015 Letter attached to this motion.

**WHEREFORE**, the Company respectfully requests that the PUC grant its Motion for Protective Treatment of the March 10, 2015 Letter attached to this motion.

Respectfully submitted,

**NATIONAL GRID**

By its attorneys,



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Raquel J. Webster, RI Bar # 9064  
National Grid  
40 Sylvan Road  
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(781)-907-2121

Dated: March 10, 2015

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

Copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and the Rhode Island Division of Public Utilities and Carriers.

\_\_\_\_\_  
Joanne M. Scanlon

March 10, 2015

Date

**Docket No. 4539 National Grid's FY 2016 Electric Infrastructure, Safety and Reliability Plan - Service List as of 2/27/15**

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