

677 BROADWAY, SUITE 1101  
ALBANY, NY 12207  
(518) 427-9700

**STEVEN D. WILSON**

DIRECT: (518) 701-2746  
FAX: (518) 427-0235  
SWILSON@HARRISBEACH.COM

August 8, 2011

Hon. Rafael Epstein  
Administrative Law Judge  
NYS Department of Public Service  
Three Empire State Plaza  
Albany, NY 12223

**Re: Case 11-W-0200: Long Island Water Corporation - Major Rate Filing**

Dear Judge Epstein:

Pursuant to your e-mail dated August 3, 2011, Long Island Water Corporation (“LIWC”) (d/b/a Long Island American Water) hereby submits the enclosed protective order for adoption in the above-referenced proceeding. LIWC respectfully requests that Your Honor issue a ruling adopting the protective order to institute uniform protocols for the handling of information deemed trade secret or confidential commercial information pursuant to Section 87 of the New York Public Officer’s Law and Section 6-1.3 of the Public Service Commission’s (“Commission”) rules (16 NYCRR § 6-1.3).

LIWC has been in discussions with Counsel for the Department of Public Service (“DPS”) and Department of State Utility Intervention Unit (“UIU”) regarding the types/categories of information that would initially be covered under the protective order. LIWC and Counsel for DPS and UIU agreed upon the following types/categories of information:

1. Salaries with job titles;
2. System infrastructure;
3. Dates of capital infusions;
4. Union salaries; and
5. Competitively bid contracts.

This list is not intended to cover all categories of confidential or trade secret information. Additional categories may be identified by LIWC through the course of discovery and the remainder of the proceeding. As additional categories are identified, LIWC will clearly label such information as confidential and/or trade secret information for appropriate treatment under the protective order. LIWC’s goal in reaching a preliminary agreement with Counsel for DPS and UIU was to relieve Counsel for DPS and UIU of the requirement to submit papers in response to LIWC’s forthcoming motion for a ruling declaring the confidential nature of these

categories of information.<sup>1</sup> Counsel for DPS and UIU could then respond, if they deemed it necessary, only to any newly claimed categories of confidential information not contained in the above list.

Thank you in advance for your consideration of this matter.

Respectfully submitted,

/s/

Steven D. Wilson

cc: Active Party List  
Mr. William Varley  
Suzana Duby, Esq.

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<sup>1</sup> In accordance with Your Honor's e-mail of August 3<sup>rd</sup>, LIWC will submit a motion in sufficient time to allow for a ruling on confidentiality before the record in this proceeding is presented to the Commission.