



March 30, 2021

Via Electronic Filing

Records Access Officer
State of New York Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

RE: Matter Number: 19-02972-Compliance Order 15-M-0127
REVISED Documents for the Updated Application of
Liberty Power Holdings, LLC.

RE: REQUEST FOR CONFIDENTIALITY TRADE SECRET

Dear Records Access Officer,

Liberty Power Holdings, LLC. (“Liberty”) respectfully requests that the information in the attached document be treated by the Commission and the Department of Public Service as trade secret information and confidential commercial information pursuant to Public Officers Law §§87(2)(d) and 89(5)(a)(1), and the Commission’s implementing regulation, 16 NYCRR §6-1.3.

The information in these documents, if made publicly available, would likely cause substantial injury to the competitive position of Liberty. Accordingly, we respectfully request that the attached documents be treated as confidential trade secret information and afforded all of the protections against public disclosure available for such information, as provided by law.

Respectfully,

Stephen Gibelli

Stephen Gibelli
General Counsel*

*Authorized Florida House Counsel, licensed in Connecticut and Massachusetts

Powerful Together