



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*