

July 3, 2023

VIA ELECTRONIC MAIL

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

Re: Case No. 15-01556
Multiple Dwelling Discontinuance Activity – 16 NYCRR Part 275.7(f) -
Compliance Filing
Request for Trade Secret Protection

Dear Ms. Vigars:

Pursuant to the requirements of the above-referenced regulation, Orange and Rockland Utilities, Inc. (the “Company”) is required to file multi-family dwelling reports with the Public Service Commission on a semi-monthly basis. These reports set forth, among other information, the owner of a multiple dwelling or the person, firm or corporation responsible for making payment for gas service at such dwelling, who fails to pay two consecutive bills for such gas service.

Pursuant to Public Officers Law §§87(2)(b) and 89(2)(b), and 16 NYCRR §6-1.3, Orange and Rockland Utilities, Inc. (the “Company”) submits this request for trade secret protection for, and confidential treatment of, the confidential information contained in the attached multi-family dwelling report (“Report”). The confidential information contained in the Report consists of customer names and account numbers¹ (“Confidential Information”). This customer information, if made publicly available, would constitute an unwarranted invasion of personal privacy.

POL, §87.2 (b) authorizes an agency to deny disclosure of records which “if disclosed would constitute an unwarranted invasion of personal privacy under the provisions of subdivision two of section eighty-nine of this article.” The Commission has stated that utility customers have “reasonable expectations of privacy, security and control over access to personally identifiable information” held by utilities and that “protection of consumer information is a basic tenet of the Public Service Law and our

¹ This information is set forth in columns A and B of the Report.

policies.”²

Accordingly, the Company respectfully requests that the Confidential Information be deemed trade secret information and afforded all of the protections against public disclosure available for such information, as provided by law.

Respectfully submitted,

/s/ John L. Carley

John L. Carley
Assistant General Counsel

Attachment

² Case 07-E-0548, “Order On Rehearing Granting Petition For Rehearing,” December 3, 2010, pp 4, 17.