



March 10th, 2026

VIA ELECTRONIC DELIVERY

Michelle Zaludek
Records Access Officer
New York State Public Service Commission
Three Empire State Plaza
Albany, New York 12223

Re: Case No. 93-G-0932 – The Brooklyn Union Gas Company d/b/a National Grid NY, KeySpan Gas East Corporation d/b/a National Grid, and Niagara Mohawk Power Corporation d/b/a National Grid: Gas Customer Migration Reports – Request for Trade Secret Protection

ATTACHMENT CONTAINS CONFIDENTIAL INFORMATION

Dear Ms. Zaludek:

Pursuant to Public Officers Law §§ 87(2)(d), 89(5)(a)(1), and Section 6-1.3 of the Commission’s Regulations, 16 NYCRR § 6-1.3, and in accordance with the October 20, 2006 letter decision issued by Secretary Brillling regarding a “Request for Certain Information in Unredacted ESCO Gas Flow-Through Data Reports for November and December 2005 (Trade Secret 06-1),” and the Record Access Officer’s March 16, 2010 letter decision regarding “Request for Records Showing 2009 Breakdown of Revenue and Number of Residential Customers for Gas & Electric per ESCO per Utility Company (Cases 93-G-0932 and 94-E-0952),” The Brooklyn Union Gas Company d/b/a National Grid NY (“KEDNY”), KeySpan Gas East Corporation d/b/a National Grid (“KEDLI”) and Niagara Mohawk Power Corporation d/b/a National Grid (“NMPC”) (collectively, “National Grid”) hereby seek confidential trade secret protection and exceptions from public disclosure for the attached February 2026 Gas Customer Migration Reports (“Migration Reports”). The Migration Reports show ESCO-specific migration data in the Company’s service territory.

National Grid requests confidential status for the Migration Reports because they capture, on a monthly basis, the number of customers that have migrated to, or from, ESCO service in each of the company’s service territories, as well as the annualized load and the total volume of gas for each of the ESCOs’ customer classes. Disclosure of this information would adversely affect ESCOs’ ability to procure natural gas supplies because suppliers could demand higher prices if suppliers knew the volume of gas ESCOs needed on a particular utility’s system. In addition, since ESCOs use available information concerning their competitors when creating their marketing plans, disclosure of the Migration Reports would unfairly assist new entrants in deciding on the timing of entry into the New York market, which markets to enter and which market segments to target or to avoid.

For the reasons stated above, National Grid respectfully requests that the Migration Reports be deemed to be confidential trade secret material exempt from public disclosure under Public Officers Law Section 87 and Part 6-1 of the Commission's Regulations.

Please contact the undersigned with any questions regarding this letter or the enclosures.

Respectfully submitted,

J. Grant Tracy
Analyst
Customer Choice / National Grid

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