

June 18, 2013

**VIA E-MAIL**

Donna Giliberto, Esq.  
Records Access Officer  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223

**CASE NO. 94-E-0952: REQUEST FOR TRADE SECRET PROTECTION –  
NIAGARA MOHAWK POWER CORPORATION D/B/A NATIONAL GRID  
ELECTRIC CUSTOMER MIGRATION REPORTS**

**ATTACHMENT CONTAINS CONFIDENTIAL INFORMATION**

Dear Ms. Giliberto:

Pursuant to Public Officers Law §§ 87[2](d), 89[5](a)(1), and Section 6-1.3 of the Commission's Rules of Procedure, 16 N.Y.C.R.R. § 6-1.3, Niagara Mohawk Power Corporation d/b/a National Grid ("National Grid") respectfully requests trade secret protection for the attached May 2013 Electric Customer Migration Report (the "Migration Report"). The Migration Report shows Energy Services Company ("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 the Company's service territory, and the total KWH for each of the ESCOs' customer classes. 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.

The Company, for the reasons stated above, 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 Commissions Regulations.

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

Respectfully submitted,

/s/ Jeremy J. Euto

Jeremy J. Euto