

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 18-0491-PET

Joint Petition of Champlain Broadband LLC, City of Burlington d/b/a Burlington Telecom, Blue Water Holdings LLC for approvals, pursuant to 30 V.S.A. § 109, 231, 504, 47 U.S.C. § 214(e), and Section 438(c)(1) of the City of Burlington Charter	
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**STIPULATED MOTION FOR APPROVAL OF
PROTECTIVE AGREEMENT**

NOW COMES Champlain Broadband LLC (“Champlain”) by and through its attorney, Wilschek Iarrapino Law Office PLLC, and moves that the Vermont Public Utility Commission (“Commission”) issue an order implementing the Protective Agreement dated as of March 2, 2018, between Champlain, Blue Water Holdings, LLC (“Blue Water”), the City of Burlington d/b/a Burlington Telecom (the “City”) (collectively, the “Petitioners”) and the Department of Public Service (the “Department” or “DPS”) (together as the “Parties”). In support of this motion, Champlain states as follows:

1. On February 26, 2018, Petitioners filed a Petition (the “Petition”) with the Commission requesting approvals pursuant to 30 V.S.A. §§ 107, 109, 231, 504, 47 U.S.C. § 214(e), and Section 438(c)(1) of the City of Burlington Charter to generally transfer control and ownership of Burlington Telcom to Champlain.

2. In order to investigate the issues that arise under the Petition, Champlain seeks to offer into evidence Confidential Exhibit Champlain-GA-2 (Eleven Year Plan) and Champlain-GA-3 (Burlington Telecom system historical operating statement) (together the “Confidential Information”).

3. The Exhibit(s) identified in paragraph 2 above contain commercially sensitive information.

4. To protect the confidentiality of such information, as well as other information that Petitioners may be requested to provide in the future in this proceeding, the Petitioners and the Department have entered into a Protective Agreement dated March 2, 2018, a copy of which is attached hereto. Included in the Protective Agreement is a Proposed Procedural Order Re: Protective Agreement which would establish a procedure to govern the disclosure and protection of information that the Parties agree to designate as confidential.

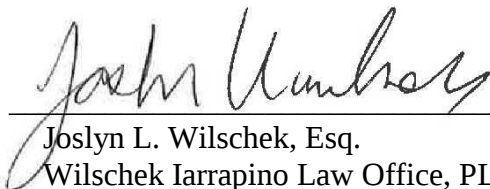
5. The enclosed Protective Agreement and proposed Procedural Order re: Protective Agreement are similar to those approved by the Commission in many prior cases.

6. I am authorized to represent that counsel for Blue Water, the City, and the Department support this motion.

WHEREFORE, Champlain requests that the Commission enter an order, substantially the same as that attached to the Protective Agreement that approves and adopts the Protective Agreement reached among the Parties.

Dated at Montpelier, Vermont, this 5th day of March 2018

CHAMPLAIN BROADBAND LLC

By: 

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