

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Petition of the Vermont Department of Public Service for an investigation into the service quality provided by Telephone Operating Company of Vermont, Inc., d/b/a Consolidated Communications, Inc. ) Case No. 18-3231-PET

**MOTION FOR EXTENSION OF TIME TO SUPPLEMENT THE REQUEST FOR  
CONFIDENTIAL TREATMENT OF DEPARTMENT PREFILED TESTIMONY  
AND/OR  
MOTION FOR EXTENSION OF TIME TO SEEK RECONSIDERATION OF THE  
COMMISSION’S JUNE 6, 2019 ORDER**

Consolidated Communications of Vermont Company LLC (formerly Telephone Operating Company of Vermont LLC) d/b/a Consolidated Communications (“Consolidated”) hereby respectfully moves for an extension of time to supplement its request for confidential treatment of the Department of Public Service’s (the “Department”) prefiled testimony and/or moves for an extension of time to seek reconsideration of the Public Utility Commission’s (the “Commission”) June 6, 2019 Order regarding confidentiality. Specifically, Consolidated requests that it be permitted to file the supplemental information to further support its request for confidential treatment of certain portions of Department witnesses Flint and Goldstein/Keener confidential prefiled testimony on or before June 26, 2019. In support of this Motion, Consolidated states:

1. The Commission’s June 6 Order appears to contemplate that further information could be filed by Consolidated, stating, “[a]bsent a more substantial and persuasive argument from Consolidated...,” the Commission deems specific information not confidential.
2. Consolidated seeks to be able to provide substantial, additional information to support confidential treatment of certain information in Flint and Goldstein/Keener testimony.

3. Consolidated remains concerned about the public disclosure of certain confidential information, and it respectfully requests an opportunity to explain in more detail the harm it believes it would incur if certain information were made public.
4. Consolidated requests additional time to provide supplemental information, as its focus in the last several days has been on completing its prefiled testimony for submission in this Case.

WHEREFORE, Consolidated respectfully requests that it be permitted to provide for the Commission's consideration additional information to further support its request for confidential treatment of certain Department testimony on or before June 26, 2019.

DATED at Burlington, Vermont, this 14<sup>th</sup> day of June, 2019.

CONSOLIDATED COMMUNICATIONS OF  
VERMONT COMPANY LLC  
d/b/a Consolidated Communications

By: \_\_\_\_\_

  
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