

STATE OF VERMONT  
PUBLIC UTILITY COMMISSION

Case No. 19-4845-PET

Petition of Southern Vermont Cable )  
Company for consent, pursuant to 30 )  
V.S.A § 109, to sell substantially all of its )  
Vermont assets to Comcast of )  
Connecticut/Georgia/Massachusetts/New )  
Hampshire/New York/North Carolina/ )  
Virginia/Vermont, LLC, approval, )  
pursuant to 30 V.S.A. § 505, of such )  
entity's abandonment of cable-television )  
service in Vermont and revocation of its )  
Certificates of Public Good )

Petition of Comcast of Connecticut/ )  
Georgia/Massachusetts/New Hampshire/ )  
New York/North Carolina/Virginia/ )  
Vermont, LLC for a Certificate of Public )  
Good, pursuant to 30 V.S.A. §§ 503 & )  
504 and Vermont Public Utility )  
Commission Rule 8.200, to own and )  
operate the cable-television systems in )  
Vermont currently owned and operated by )  
Southern Vermont Cable Company )

**MOTION FOR PROTECTION OF PROPRIETARY  
AND COMMERCIALY SENSITIVE INFORMATION**

Comcast of Connecticut/Georgia/Massachusetts/New Hampshire/New York/North Carolina/Virginia/Vermont, LLC ("Comcast") and Southern Vermont Cable Company ("SVCC"), hereby move the Vermont Public Utility Commission ("Commission") to issue an order protecting proprietary and commercially sensitive information from being revealed during the hearing in the above referenced proceeding.

**MEMORANDUM IN SUPPORT OF MOTION**

Comcast and SVCC have previously asserted that certain information they have provided to the Department was made under objection. A Motion for Approval of their Protective Agreement

was filed with the Commission under date of February 12, 2010. Comcast and SVCC have maintained that this information is commercially sensitive and protected confidential information, and that public disclosure of such information including disclosure within the evidentiary record in this proceeding should be protected.

On March 9, 2020, the Hearing Officer issued a Procedural Order Re: Protective Agreement acknowledging that SVCC and Comcast (and other parties) may have information that they allege is of a confidential and proprietary nature. In the introductory portion of his Order the Hearing Officer stated, with footnote: “(i)f a Party wishes to keep confidential any material that is proffered for inclusion in the evidentiary record, that Party must present a properly supported motion for protection of that material.<sup>1</sup>”

Department witness Scott Wheeler referenced certain limited information relating to the purchase price. It was, per the understandings between the Parties, excluded from Mr. Wheeler’s testimony, on the grounds that it was commercially sensitive and confidential information. Comcast and SVCC now wish to ensure that this confidential information is not revealed during the hearing process.

Comcast includes herewith a detailed, document-specific averment from Daniel Glanville and Ernie Scialabba, addressing the Commission’s relevant factors, to the extent Comcast and SVCC “rely upon that factor as the basis for an assertion of confidentiality”. See Attached Averment of Daniel Glanville and Ernie Scialabba.

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<sup>1</sup> “The party claiming confidentiality for the material in Scott Wheeler’s testimony filed by the Department on March 4, 2020, should file a motion for the protection of that material consistent with the requirements of this order.”

DATED at Montpelier, Vermont on 18 day of March, 2020.

Southern Vermont Cable Company

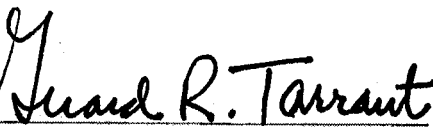
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