

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 21-4060-PET

Petition of Consolidated Communications of Vermont Company, LLC and Consolidated Communications of Northland Company (both d/b/a “Consolidated Communications”) for approval of a Successor (2022-2024) Incentive Regulation Plan, pursuant to 30 V.S.A. § 226b	
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MOTION FOR APPROVAL OF PROTECTIVE AGREEMENT

Consolidated Communications of Vermont Company, LLC and Consolidated Communications of Northland Company (both d/b/a “Consolidated Communications”) hereby move the Vermont Public Utility Commission (“Commission”) to approve the Protective Agreement and attached proposed Protective Order.

MEMORANDUM IN SUPPORT OF MOTION

Consolidated Communications states that certain information it has or may be requested to produce is protected, confidential information, and that public disclosure of such information could cause cognizable harm to the respective companies. Consolidated Communications requests that the Commission approve the attached Protective Agreement in order to facilitate the provision of such information in this proceeding, while preserving its confidentiality. A proposed Protective Order is attached to the Protective Agreement as Schedule IV.

DATED at Burlington, Vermont this 18th day of November 2021.

RESPECTFULLY SUBMITTED,

**Consolidated Communications of Vermont
Company, LLC, and Consolidated
Communications of Northland Company**

/s/ Debra L. Bouffard

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