

Competitively Sensitive RNG Pricing Information
Petition of Vermont Gas Systems, Inc., for
approval of an out-of-state renewable gas
purchase contract with a term exceeding 5
years pursuant to 30 V.S.A. § 248(i)

Case No.

Confidential Documents and Information
June 13, 2022

A. Identification of Document or Information.

- **CONFIDENTIAL Exhibit VGS-TL-2 (Transaction Confirmation):**

B. Degree of Confidential Information.

This material has not been made public, as set forth below.

The pricing information contained in this Confidential Exhibit is highly sensitive in the competitive and emerging marketplace for RNG supply. The public disclosure of this pricing information could be unfair and detrimental to VGS's business and its customers' interests because competitors and developers in the RNG wholesale market could use the information created and developed by VGS and Archaea to adversely affect the competitiveness of future RNG prices. Public disclosure would permit competitors to take advantage of RNG pricing modeling to undermine VGS and its customers as VGS negotiates future contracts for additional RNG supply.

C. Confidentiality Factors.

i. Extent Information Known Outside Company

This confidential information is known only by the parties to contract between VGS and Archaea, and the authorized recipients of gas volume and/or pricing information under confidentiality agreements.

ii. Extent Information Known by Employees and Independent Contractors

This confidential information is known only to VGS, Archaea, and their personnel, consultants, and legal advisors on a need-to-know basis.

iii. Measures Taken to Guard Security

This information is maintained by VGS and Archaea in limited access computer files and in secure files.

iv. Value of Information to Company and Competitors

The information is competitively sensitive and contains information, the disclosure of which would impact VGS's bargaining position in future

VGS Averment No. 1:

Competitively Sensitive RNG Pricing Information
Petition of Vermont Gas Systems, Inc., for
approval of an out-of-state renewable gas
purchase contract with a term exceeding 5
years pursuant to 30 V.S.A. § 248(i)

Case No.

Confidential Documents and Information
June 13, 2022

RNG supply matters and wholesale elections under the contract with
Archaea.

v. Amount of Money or Effort to Develop Information

This information was developed by VGS and Archaea at their own time
and expense, based on their familiarity, experience, training, and
expertise in the industry. That work, as well as the value of the underlying
transaction itself, are at risk in the event of disclosure of the confidential
information.

vi. Cost/Difficulty in Acquiring/Duplicating Information

See C.v.

vii. Harm of Disclosure

See B and C.iv.

D. Time Period

The information should be kept confidential for five years after termination of
the contract with Archaea.

E. Partial Disclosure or Redaction

VGS has prepared a redacted version of the contracts at issue for partial disclosure to
the public.

F. Other Factors

None.