

STATE OF VERMONT
PUBLIC SERVICE BOARD

Amended Joint Petition of Central Vermont)	
Public Service Corporation, Danaus Vermont)	
Corp., Gaz Métro Limited Partnership, Gaz)	
Métro inc., Northern New England Energy)	
Corporation for itself and as agent for Gaz Métro)	
Limited Partnership's parents, Green Mountain)	
Power Corporation and Vermont Low Income)	
Trust for Electricity, Inc. for approval of: (1) the)	Docket No. 7770
merger of Danaus into and with Central)	
Vermont, (2) the acquisition by Northern New)	
England of the common stock of Central)	
Vermont, (3) the amendment to Central)	
Vermont's Articles of Association, (4) the)	
merger of Central Vermont into and with Green)	
Mountain, and (5) the acquisition by VLITE of a)	
controlling interest in Vermont Electric Power)	
Company, Inc.)	

MOTION FOR PROTECTIVE ORDER

Pursuant to Public Service Board ("Board") Rule 2.206, Central Vermont Public Service Corporation ("CVPS" or "Central Vermont"), Danaus Vermont Corp. ("Danaus"), Northern New England Energy Corporation ("NNEEC"), for itself and as agent for the direct and indirect upstream parents of Gaz Métro Limited Partnership ("Gaz Métro"), Gaz Métro, Gaz Métro inc. ("GMi"), Green Mountain Power Corporation ("GMP" or "Green Mountain Power"), and Vermont Low Income Trust for Electricity, Inc. ("VLITE") (collectively, "Petitioners") move for an Order implementing the Protective Agreement dated as of September 27, 2011 (the "Protective Agreement"), among Petitioners and the State of Vermont Department of Public Service (the "Department" or "DPS") (Petitioners, the Department and each other party that may hereafter join in the Protective Agreement will be sometimes referenced herein, where the

context requires, as a “Party” and collectively as the “Parties”). In support of this motion, Petitioners state as follows:

1. The Petitioners have filed a petition seeking Board approval of (1) the acquisition by NNEEC of a controlling interest in Central Vermont and the merger of Danaus into and with Central Vermont, with Central Vermont as the surviving company; (2) the amendment to Central Vermont’s Articles of Association; (3) the indirect acquisition by NNEEC of a controlling interest in Vermont Yankee Nuclear Power Corporation (“VYNPC”), Vermont Electric Power Company, Inc. (“VELCO”), Vermont Transco LLC (“Transco”) and Vermont Electric Transmission Company, Inc. (“VETCO,” and together with VELCO and Transco, the “VELCO Companies”); (4) the transfer to VLITE of an ownership interest of approximately 33% of the VELCO Class B voting common stock and approximately 31.7% of the VELCO Class C non-voting common stock by CVPS to VLITE; and (5) the merger of Central Vermont into and with Green Mountain Power, with Green Mountain Power as the surviving company.

2. The Petitioners have information pertinent to the matters relating to these proceedings that they have been, or may be, asked to provide to the Department or to the Parties, which Petitioners believe could result in financial and/or competitive harm to the Petitioners, or the entities who provided such information to the Petitioners, if they are required to disclose such information to the public.

3. The information described in the preceding paragraph is proprietary, privileged, confidential or in the nature of a trade secret.

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, Petitioners and the other Parties have entered into the Protective Agreement dated September 27 2011, a copy of

which is attached hereto. Included in the Protective Agreement is a Proposed Procedural Order
Re: Protective Agreement that would establish a procedure to govern the disclosure and
protection of information that the Parties agree to designate confidential.

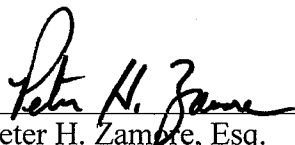
WHEREFORE, Petitioners request that the Board enter an order, in the form attached to
the Protective Agreement, that approves and adopts the Protective Agreement reached among the
Parties.

Dated this 27th day of September 2011.

On behalf of Petitioners, CENTRAL VERMONT PUBLIC
SERVICE CORPORATION, NORTHERN NEW
ENGLAND ENERGY CORPORATION, for itself and as
agent for Gaz Métro Limited Partnership's parents, GAZ
MÉTRO LIMITED PARTNERSHIP, GAZ MÉTRO INC.,
DANAUS VERMONT CORP., GREEN MOUNTAIN
POWER CORPORATION and VERMONT LOW
INCOME TRUST FOR ELECTRICITY, INC.

By Sheehey Furlong & Behm P.C.

By: _____


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