

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 24-2945-PET

Petition of VT Real Estate Holdings 2 LLC for a certificate of public good, pursuant to 30 V.S.A. § 248, authorizing the installation and operation of a 20 MW solar electric generation facility in Fair Haven, Vermont	
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MOTION FOR PROTECTIVE ORDER

Petitioner VT Real Estate Holdings 2 LLC (“Petitioner” or “Fair Haven Solar”), pursuant to Public Utility Commission (“Commission” or “PUC”) Rule 2.230(B), respectfully moves the Commission to issue a Protective Order approving the attached Protective Agreement dated April 29, 2025 between Fair Haven Solar and the Vermont Department of Public Service (“Department”). Fair Haven Solar and the Department have agreed to the terms of the Protective Agreement, including Schedule IV thereto, which represents a Proposed Protective Order. The Protective Agreement is needed to protect materials that have, and may be, requested in discovery that could result in financial or competitive harm if it were publicly disclosed, or that may constitute Critical Energy Infrastructure Information as defined in 18 C.F.R. § 388.113. The attached forms of Protective Agreement and Proposed Order have been approved by the Commission in other proceedings to facilitate the provision of information while preserving its confidentiality.

With this request for Commission approval of a Protective Order, Petitioner has identified confidential documents on Schedule I and has provided a supporting averment to seek protection of specific confidential materials requested by the Department in discovery.

Dated at Burlington, Vermont this 1st day of May, 2025.

VT REAL ESTATE HOLDINGS 2 LLC

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