

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

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| <p>Petition of Vermont Transco LLC and Vermont Electric Power Company, Inc., pursuant to 30 V.S.A. § 248(j), to amend the certificate of public good issued in Docket No. 4905, as amended in Docket No. 4905-A</p> | <p>Case No. 25-____-PET</p> |
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**MOTION FOR CONFIDENTIAL TREATMENT  
OF PREFILED EVIDENCE**

Vermont Transco LLC and Vermont Electric Power Company, Inc. (collectively, “VELCO”) request that the Public Utility Commission (“Commission”), pursuant to Commission Rule 2.226, issue a protective order that grants confidential treatment to an electrical system study filed under seal in this case in support of VELCO’s petition for a certificate of public good to increase the operating capacity of the Highgate Interconnect Facilities. This Motion, along with a supporting averment (Attachments A) and a proposed order (Attachment B), have been filed electronically using ePUC.

In support of this Motion, VELCO represents as follows:

1. On October 21, 2025, VELCO filed a petition (the “Petition”) with the Commission, pursuant to 30 V.S.A. § 248(j), to amend the certificate of public good issued in Docket No. 4905, as amended in Docket No. 4905-A, to authorize increasing the operating capacity of the interconnection-line portion of the Highgate Transmission Facilities from 225 MW to 250 MW (the “Capacity Upgrade”).<sup>1</sup>

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<sup>1</sup> The Highgate Interconnection Facilities consist of a 120 kV transmission line and a back-to-back DC converter station located at 2694 VT Route 78 in Highgate, Vermont (the “Converter Station”). The transmission line extends approximately 7.5 miles from the U.S.-Canada border near Franklin, Vermont, to the Converter Station, connecting the Hydro-Québec electric system in Canada with VELCO’s transmission system.

2. VELCO filed a performance review of the Converter Station in support of the Petition that contains confidential Critical Energy Infrastructure Information (“CEII”): Exhibit PET-JP-4 (Conf.) (the “Highgate Report”).

3. CEII is defined in 18 C.F.R. § 388.113(c)(2) as specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (i) relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) could be useful to a person in planning an attack on critical infrastructure; (iii) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. 552; and (iv) does not simply give the general location of the critical infrastructure.

4. The Highgate Report filed under seal as Exhibit PET-JP-4 (Conf.) includes confidential information concerning VELCO’s bulk electric system. The Highgate Report contains data on vulnerabilities of VELCO facilities, including detailed information on facility locations, access and security measures, planning criteria and deficiency analysis, and communication details, all presented within the context of accompanying diagrams. VELCO is concerned that some of the information in the report constitutes CEII and therefore is required to take appropriate measures to prevent disclosure.

5. In determining whether to grant a request for confidential treatment, the Commission considers five issues:

- (i) Is the matter sought to be protected a trade secret or other confidential research, development, or commercial information, which should be protected?
- (ii) Does the matter sought to be protected contain CEII?
- (iii) Does the matter sought to be protected contain information related to a utility’s cybersecurity program?

- (iv) Would disclosure of the information cause a cognizable harm sufficient to warrant confidential treatment?
- (v) Has the party seeking protection shown “good cause” for invoking the Commission’s protection?<sup>2</sup>

6. The Commission has consistently recognized that electrical reports containing CEII cannot be disclosed to any person who has not agreed to be bound by the terms of a protective order.<sup>3</sup> As in those proceedings, VELCO through this Motion and the supporting averment makes a *prima facie* showing that the Highgate Report contains CEII, release of the Highgate Report can cause significant harm, and, therefore, there is good cause to limit disclosure of the Highgate Report to those parties who agree to be bound by the protective order.

7. Due to the nature of the confidentiality claim, Petitioner does not anticipate that the Highgate Report could be released from the terms of the proposed protective order at a future time.

8. The issuance of the requested protective order should not hinder the public’s ability to understand the proposed Capacity Upgrade. Material information regarding the Capacity Upgrade is presented in substantial detail in the petition as well as the supporting prefiled testimony and non-confidential exhibits.

9. For the reasons stated above, Petitioner submits there is good cause for the PUC to issue a protective order treating the information identified in Petitioner’s averment (Attachments A) as confidential in the manner set forth in the proposed order (Attachment B).

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<sup>2</sup> Rule PUC 2.226(C)(4)(a)-(e).

<sup>3</sup> See, e.g., *Petition of Vermont Transco LLC (Highgate Substation Upgrades)*, Case No. 22-4338-PET, Order of 10/28/22; *Petition of Champlain VT, LLC*, Docket No. 8400, Order of 06/26/17; *Petition of Vt. Green Line Devco, LLC*, Docket No. 8847, Order of 11/30/16 at 7; *Amended Petition of Deerfield Wind, LLC*, Docket No. 7250, Order of 2/11/16 at 8-9.

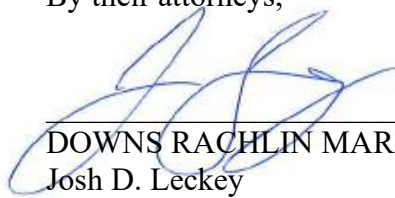
CONCLUSION

Petitioner respectfully requests that the PUC grant this Motion for Confidential Treatment of Prefiled Evidence and issue a protective order in the form provided as Attachment B. Petitioner submits that such treatment will facilitate the purposes of this proceeding and will not be detrimental to the public interest.

DATED at Burlington, VT this 21st day of October, 2025.

VERMONT ELECTRIC POWER COMPANY, INC.  
AND VERMONT TRANSCO LLC

By their attorneys,



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