

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-2590-PET

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	
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**RESPONSE OF THE VERMONT DEPARTMENT OF PUBLIC SERVICE TO VELCO's
MOTION FOR CONFIDENTIAL DESIGNATION**

On October 21, 2025, Vermont Transco, LLC and Vermont Electric Power Company, Inc. (collectively, “VELCO”) filed a 30 V.S.A. § 248(j) requesting that the Vermont Public Utility Commission (“Commission”) grant an amendment to the certificate of public good (“CPG”) issued on August 10, 1984, in Docket No. 4905 (and amended on January 25, 1995, in Docket No. 4905-A). Specifically, VELCO requests Commission authorization to increase the operating capacity of the Highgate Interconnection Facilities (generally consisting of a transmission line and back-to-back converter station) from 225 MW to 250 MW. In support of this petition, VELCO submitted Exhibit PET-JP-4, Highgate Converter Performance Review, under seal and supplied a motion requesting that the exhibit be granted confidential treatment because it allegedly contains Critical Energy Infrastructure Information (“CEII”) under 18 C.F.R. § 388.113(c)(2). VELCO requests that this exhibit be treated confidentially indefinitely.

Broadly speaking, if disclosed, CEII could be used to attack or exploit critical energy infrastructure and thereby cause significant disruption and harm. The Department of Public Service (“Department”) has obtained a copy of Exhibit PET-JP-4, Highgate Converter Performance Review, under the terms of a protective agreement it entered with VELCO on November 6, 2025, which is pending Commission approval following VELCO’s filing of it. The averment VELCO sent to the Department under the terms

of the Protective agreement asserts that a redacted and thereby publicly available version of the exhibit would not provide the public with meaningful information.

The Department has reviewed Exhibit PET-JP-4, Highgate Converter Performance Review. The Department questions whether the Summary portion of Exhibit PET-JP-4, on pages I through V, plus the table of contents and lists of figures and tables, could instead be made public with minimal redactions and therefore requests that VELCO explain why this material should be granted confidentiality. Otherwise, the Department supports VELCO's motion for confidential treatment of the remainder of the exhibit because it contains CEII.

Thank you, please do not hesitate to contact me with any questions or concerns.

Dated at Montpelier, Vermont, this 10th day of November 2025

VERMONT DEPARTMENT OF PUBLIC SERVICE

By:

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