

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 21-1107-PET

Petition of GlobalFoundries U.S. 2 LLC requesting  
a certificate of public good, pursuant to 30 V.S.A. § 231,  
to operate a Self-Managed Utility

Case No. 21-1109-PET

Petition of Green Mountain Power Corporation for  
approval to modify service territory pursuant to  
30 V.S.A. § 249

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**JOINT MOTION FOR APPROVAL OF PROTECTIVE AGREEMENT**

Intervenors Conservation Law Foundation (“CLF”) and AllEarth Renewables, Inc. (“AER”) jointly move that the Vermont Public Utility Commission (“Commission”) enter a Protective Order approving the Protective Agreement executed by all parties to this matter and filed herewith. In support of this Motion, it is stated:

1. Hearings in these matters are presently scheduled for October 14-15, 2021, pursuant to the Scheduling Order of May 24, 2021. AER yesterday filed a motion to amend the Scheduling Order to allow time for dispositive pre-hearing motions.
2. Certain parties to these matters assert that they are in possession of materials which are subject to confidential treatment if they are to be disclosed in response to discovery requests.
3. It is our understanding that the Commission has over the years utilized a mechanism under which it has accepted Protective Agreements that are carefully constructed to facilitate the exchange of allegedly confidential information during the course of discovery. The Protective Agreement and proposed *Procedural Order re: Protective Agreement* filed herewith are intended to fully reflect that approach.
4. All parties to these matters have executed the Protective Agreement.

For these reasons, CLF and AER respectfully request that the Commission approve the Protective Agreement through issuance of a Protective Order in the form filed with this Motion.

Dated this 21<sup>st</sup> day of September 2021.

CONSERVATION LAW FOUNDATION



By: \_\_\_\_\_

Chase S. Whiting, Staff Attorney  
Conservation Law Foundation  
15 East State Street, Suite 4  
Montpelier, VT 05602  
(802) 223-5992 x. 4013  
(802) 223-0060 (fax)  
[cwhiting@clf.org](mailto:cwhiting@clf.org)

ALLEARTH RENEWABLES, INC.

By: /s/ **David Mullett**

David Mullett, General Counsel  
AllEarth Renewables, Inc.  
94 Harvest Lane  
Williston, VT 05495  
802-872-9600  
[dmullett@allearthrenewables.com](mailto:dmullett@allearthrenewables.com)

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