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Department of Public Service
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May 2, 2017

Ms. Judith C. Whitney, Clerk
Vermont Public Service Board
112 State Street
Montpelier, VT 05620

Re: Docket No. 8880 – Motion for Protective Order

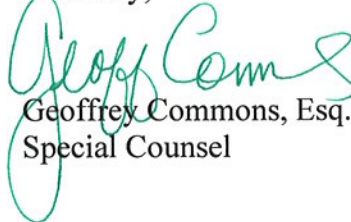
Dear Ms. Whitney:

Enclosed for filing with the Public Service Board is the Department of Public Service's Motion for Protective Order with an executed Protective Agreement and schedules thereto, including a proposed Procedural Order re: Protective Agreement. Although not all parties have chosen to sign the Protective Agreement, it has been circulated to all parties to this docket.

The Department and Joint Petitioners respectfully request that this Motion receive expedited review by the Board, and that the Board issue a Protective Order as soon as possible. As the Board is aware the Joint Petitioners have responded to the first round of discovery, but have not provided any Allegedly Confidential Documents pending issuance of an Order approving the Agreement and establishing procedures for the treatment of such documents. The non-petitioning parties anticipate receiving a significant volume of Allegedly Confidential Documents that they will need to review in order to prepare a second round of discovery and generally adhere to the schedule established in this docket.

Thank you for your attention to this matter. Please let me know if any addition information would be helpful.

Sincerely,



Geoffrey Commons, Esq.
Special Counsel

Enclosures

cc: Service via ePSB

