

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
APPLICATION OF THE TOWERS, LLC FOR A	:	DOCKET NO. 523
CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY AT 425	:	
OLD TAVERN ROAD, ORANGE,	:	
CONNECTICUT	:	JULY 10, 2024

MOTION FOR PROTECTIVE ORDER

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) respectfully requests that the Connecticut Siting Council (“Council”) issue a Protective Order pursuant to Connecticut General Statutes section 1-210(b)(5), with respect to certain terms of a Land Lease Agreement (the “Agreement”), between Frederick A. Knight and Cellco submitted to the Council in connection with the above-referenced proceeding.

Connecticut General Statutes section 16-50o provides, in relevant part:


The applicant shall submit into the record the full text of the terms of any agreement . . . entered into by the applicant . . . in connection with the construction or operation of the facility. This provision shall *not* require the disclosure of proprietary information or trade secrets.

Conn. Gen. Stat. § 16-50o(c) (emphasis added). Pursuant to this requirement, Cellco submitted a redacted copy of the Agreement to the Council in the Docket No. 523 Application. (*See* Application, Attachment 17). The redacted provisions relate to financial terms and other confidential information contained in the Agreement (“Confidential Information”). Cellco is willing to submit an unredacted copy of the Agreement to the Council subject to the issuance of a Protective Order that would limit disclosure of the Confidential Information to the Council and its staff.

As reflected in the attached Affidavit of Tim Parks, Real Estate-Regulatory Specialist with Cellco, the information for which Cellco seeks protected treatment is commercially valuable, confidential and proprietary, market-sensitive information that constitutes trade secrets within the meaning of Connecticut General Statutes §1-210(b)(5), and which Cellco has heretofore used its best efforts to maintain as secret in order to avoid the harm that would result if the Confidential Information were to become publicly available. The Council has historically granted protected treatment of similar filings.

WHEREFORE, Cellco respectfully request that the Council grant the request for protected treatment consistent with the attached Protective Order for the Agreement, which would limit disclosure of the Confidential Information to the Council and its staff.

Respectfully submitted,
THE TOWERS, LLC

By 

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