

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

PETITION OF CROWN CASTLE TOWERS 06-2	:	
LLC AND NEW CINGULAR WIRELESS PCS,	:	DOCKET NO. 546
LLC d/b/a AT&T FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE CONSTRUCTION,	:	
MAINTENANCE, AND OPERATION OF A	:	
TELECOMMUNICATIONS FACILITY AND	:	
ASSOCIATED EQUIPMENT LOCATED AT 70	:	
UNIVERSAL DRIVE, NORTH HAVEN,	:	January 27, 2026
CONNECTICUT	:	

MOTION FOR PROTECTIVE ORDER

Crown Castle Towers 06-2 LLC and its affiliates (“Crown Castle” or “Applicant”) respectfully request that the Connecticut Siting Council (“Council”) issue a Protective Order in accordance with the Council’s ruling in Docket 366 and pursuant to Connecticut General Statutes sections 1-210(b)(5) and 16-50o, with respect the Option and Ground Lease Agreement (the “Agreement”) between North Haven Property LLC and Crown Castle Towers 06-2 LLC.

The Applicant submitted a redacted copy of the Agreement to the Council in connection with the above-referenced proceeding with its Application (Exhibit 2 to the Application). Although CGS § 16-50o(c) requires the Applicant to enter the Agreement into the record, it “shall **not** require the disclosure of proprietary information or trade secrets.” (emphasis added). The Applicant considers the financial terms of the Agreement, including, without limitation, the amount of rent and other payments, to be proprietary corporate information (the “Confidential Information”). Furthermore, the Confidential Information is not relevant to the proceeding and should therefore be excluded from public disclosure. Therefore, the Confidential Information was redacted from the Agreement filed with the Application.

In its Interrogatories to the Applicant, the Council requested that the Applicant provide an unredacted copy of the Agreement for the proposed site. The Applicant is willing to submit an unredacted copy of the Agreement to the Council subject to the issuance of a Protective Order limiting the disclosure of the Confidential Information to the Council and its staff.

The Applicant has attached an Affidavit of Sonny Pieper, Site Development Program Manager for Crown Castle stating that the Confidential Information 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 that public disclosure of such information would be harmful to the Applicant. The Council has historically granted requests to protect similar confidential and proprietary information.

The Applicant hereby respectfully requests that the Council grant their 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,
Crown Castle Towers 06-2 LLC



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Certificate of Service

A copy of the Applicant's Motion for Protective Order has been sent to the following via electronic mail.

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