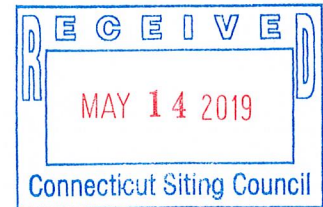


STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL



IN RE:
APPLICATION OF MCM HOLDINGS, LLC AND
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR THE
CONSTRUCTION, MAINTENANCE, AND OPERATION
OF A TELECOMMUNICATIONS FACILITY AT ONE
OF THE TWO CANDIDATE SITES WITHIN THE
TOWN OF WESTBROOK, CONNECTICUT

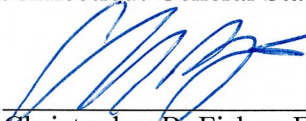
DOCKET NO. 485

May 13, 2019

Confidential

MOTION FOR A PROTECTIVE ORDER RELATED TO DISCLOSURE
OF THE EXACT MONTHLY RENT IN THE LEASE AGREEMENTS BETWEEN
MCM HOLDINGS, LLC AND LESSORS

In furtherance of the Council's ruling in Docket 366, the Applicant, MCM Holdings, LLC ("MCM") respectfully moves for a protective order related to the disclosure of the exact monthly rent in the respective lease agreements with THE CONNECTICUT WATER COMPANY and DATILLO FAMILY HOLDING, LLC ("Landlords"). The Siting Council's evaluation of the Applicant's proposed facilities should not be based on the financial terms of MCM'S agreements with the Landlords as it does not relate to the criteria set forth in Section 16-50p of the Connecticut General Statutes. Additionally, MCM considers the specific amount of rent and other financial terms that these parties agreed upon as proprietary corporate information. It is respectfully submitted that the specific monthly rent of the lease agreements between MCM and the Landlords as well as other financial terms is not relevant to this proceeding and should be excluded from any public disclosure. In furtherance of this motion, portions of the leases with the monthly rent and other financial terms disclosed have been provided in the included sealed envelope and marked "Confidential: Disclosure of the Contents is Bound by Protective Order Issued by the Siting Council" with a redacted copy of the leases attached to this motion and provided in furtherance of Section 16-50o(c) of the Connecticut General Statutes.



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Attorneys for the Applicant