

Petition of Vermont Electric Power Company, Inc. and Vermont Transco LLC (“VELCO”)

**A. Identification Of Document Or Information For Which Confidential Treatment is Sought.**

Vermont Electric Power Company, Inc. and Vermont Transco LLC (collectively “VELCO”) seek confidential treatment of Critical Energy Infrastructure Information (“CEII”) contained in:

1. **CONFIDENTIAL** Exhibit Petitioner DAP-2 (VELCO Irasburg Substation Condition Assessment); and
2. **CONFIDENTIAL** Exhibit Petitioner EJM-2 (Irasburg Substation One-Line Diagram).

**B. Explanation Of Degree To Which Document Or Information Is Confidential.**

The above information for which confidential treatment is sought contains transmission facility details including electrical ratings and component information, such as critical cyber assets, that could be useful to a person planning an attack on critical infrastructure.

All of the information listed above falls within the definition of CEII because it constitutes: “specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure that: (i) relates details about the production, generation, transportation, transmission, or distribution of energy; (ii) could be useful to a person in planning an attack on critical infrastructure; (iii) is exempt from mandatory disclosure under the Freedom of Information Act, 5 U.S.C. § 552; and (iv) does not simply give the general location of the critical infrastructure.” 18 C.F.R. § 388.113(c)(2).

**i. Extent To Which The Information Is Confidential.**

The information contains specific engineering, vulnerability, or detailed design information about proposed or existing critical infrastructure. In particular, **CONFIDENTIAL** Exhibit Petitioner DAP-2 and **CONFIDENTIAL** Exhibit Petitioner EJM-2 depict the design standards and operating details for the substation, including specific information or locations of vulnerable assets a third party wishing to do harm could use to severely damage critical electric system assets. VELCO also seeks to protect specific voltage and component information contained in these exhibits that could be useful to a person planning an attack on critical infrastructure.

**ii. The Measures Taken To Secure The Confidential Information.**

The information is kept in restricted access computer files and secure files. Documents containing CEII are only displayed in secure areas.

**C. Confidentiality Factors.**

**i. Extent Information Known Outside Company.**

CEII information is known to utilities, regulators, and persons who have followed FERC's policies relating to the disclosure of CEII which has been deemed sensitive for national security reasons.

**ii. Extent Information Known By Employees And Independent Contractors.**

With the limited exceptions listed above, the information is available to VELCO personnel, to VELCO witnesses in this case, and to consultants under protective agreements.

**iii. Measures Taken To Guard Security.**

See B.ii.

**iv. Value Of Information To Company And Competitors.**

Release of this information would harm VELCO by subjecting it to potential security risks and to penalties for violation of law and/or FERC regulations.

**v. Amount Of Money Or Effort To Develop Information.**

This type of information is not necessarily costly for VELCO to develop, however, release of the information could subject VELCO to costly penalties. See C.iv.

**vi. Cost/Difficulty In Acquiring/Duplicating Information.**

See C.v.

**vii. Harm Of Disclosure.**

See C.iv.

**D. Justification Of Time Period For Which Material Should Be Kept Confidential.**

VELCO requests confidential treatment of the information contained in the exhibits listed above in paragraph A, for as long as the information at issue constitutes CEII within the meaning of 18 C.F.R. § 388.113, or until the passage of any successor regulation or law that lifts the prohibition on disclosure of the information at issue.

**E. Partial Disclosure Or Redaction.**

VELCO seeks confidential treatment of the exhibits identified as being CEII. Redacted versions of the exhibits would produce a document that would be incomplete and of little usefulness, so redacted versions have not been prepared.

**Other Factors.**

None.