

FILE

Before
The Public Utility Commission of Ohio

In the matter of the :
Certification Application of :
RD Energy, Inc. for : Case No:10-0073-GA-AGG
Natural Gas Brokers/Aggregators :

MOTION FOR PROTECTIVE ORDER

RD Energy, Inc. moves for a protective order to prevent public disclosure of the confidential and proprietary financial information included as Exhibits C-3, C-5, C-6 and C-7 in RD Energy, Inc.'s Certification Application for Competitive Retail Natural Gas Brokers/Aggregators. In support of this Motion, RD Energy, Inc. states as follows:

1. RD Energy, Inc. is applying for Certification Application for Competitive Retail Natural Gas Brokers/Aggregators. As part of that Application, RD Energy, Inc. is asked to provide audited financial statements and a credit report via Exhibits C-3, C-5, C-6 and C-7.


2. RD Energy, Inc., an Ohio Corporation, is a privately held company and is not required to file financial information with the United States Securities and Exchange Commission and does not otherwise disclose financial information to the public.

3. The information contained therein is extremely sensitive financial information, and disclosure of such information to the general public or competitors would be extremely detrimental.

4. Due to the sensitive nature of the confidential and proprietary information, it is appropriate for the Commission to limit access to it. The exhibits should be used solely by the Commission in exercising its governmental functions in considering RD Energy, Inc.'s application. There is no legitimate purpose or public interest to be served in disclosing the confidential exhibits to any of RD Energy, Inc.'s current or future competitors or to any person other than the appropriate staff of the commission.

WHEREFORE, RD Energy, Inc. respectfully requests that the Commission grant a Protective Order allowing Exhibits C-3, C-5, C-6 and C-7 of the Application be treated as confidential.


Respectfully Submitted,



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