

11-1493-GA-CRS

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the)		2	i e
Competitive Retail Natural Gas)			2
Certification Application for:)	T	HAR	<u> </u>
Blue Pilot Energy, LLC)		R 29	G
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MOTION FOR A PROTECTIVE ORDER			9: 3	K

Pursuant to Ohio Administrative Code Chapter 4901-1-02(E), Blue Pilot Energy, LLC (hereinafter "Blue Pilot") respectfully requests that the Ohio Public Utilities Commission ("Commission") enter an Order to protect the confidentiality of its financial information submitted as Exhibits C-3 and C-5 to its Competitive Retail Natural Gas Certification Application.

Blue Pilot is a privately held Limited Liability Company and its financial statements are not part of the public record in any jurisdiction. Further, Blue Pilot submits that its financial information constitutes trade secrets under Ohio law, the disclosure of such information would be detrimental to Blue Pilot in the competitive retail natural gas competitors may obtain sensitive financial and business plan information, and non-disclosure of its financial information is consistent with Title 49 of the Ohio Code. Accordingly, Blue Pilot requests the Commission treat Exhibits C-3 and C-5 as confidential and not disclose the financial information or any information contained therein to any person not responsible for reviewing its application.

Respectfully submitted,

Lance J/M. Steinhart

Lance J.M. Steinhart, P.C.

1720 Windward Concourse, Suite 115

Alpharetta, Georgia 30005

(770) 232-9200

(770) 232-9208 (Fax)

Isteinhart@telecomcounsel.com (E-mail)

Attorney for Blue Pilot Energy, LLC

Dated: 3/28/2011