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August 18, 2011

VIA FED EX

Public Utilities Commission of Ohio
Docketing Division 13th Floor
180 East Broad Street
Columbus, OH 43215-3793

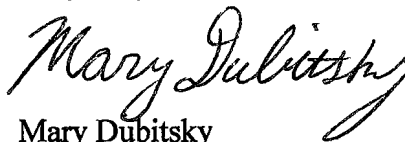
Re: North Shore Energy Consulting, Motion for Protective Order –
Certification Application for Competitive Retail Natural Gas Brokers/Aggregators

Dear Docketing Division:

Enclosed for filing with the Commission are an original and three (3) copies of a motion for Protective Order and a Memorandum in Support relating to the confidentiality of the financial documents in North Shore Energy Consulting's Certification Application for Competitive Retail Natural Gas Brokers/Aggregators ("Gas Application"). The financial documents are marked as Exhibits C-2, C-3 and C-5 of the Gas Application are labeled "Confidential" and are being filed with the commission under seal of confidentiality along with this Motion for Protective Order. These documents must not be disclosed or disseminated to the public without HPG's prior written consent. HPG's Gas Application and public documents are being filed concurrently but separately from this Motion for Protective Order and Memorandum in Support.

Please date stamp the extra copies of this transmittal letter and Motion, and return them to me in the self-addressed, stamped envelope. If you have any questions regarding these filings please contact me at your convenience. Thank you.

Very truly yours,


Mary Dubitsky

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Technician MN Date Processed AUG 24 2011

BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO

North Shore Energy Consulting, LLC :

For Competitive Retail Natural Gas :
Brokers/Aggregators :

Case No. *11-4481-CA-ALL*

MOTION FOR PROTECTIVE ORDER TO PROTECT CONFIDENTIAL AND
PROPRIETARY INFORMATION OF NORTH SHORE ENERGY CONSULTING,
LLC.

North Shore Energy Consulting, LLC ("North Shore" or "Movant") pursuant to 83 Ill. Adm. Code. 200.430, hereby moves the Public Utilities Commission of Ohio ("Commission") for a protective order to protect portions of North Shore's Certification Application for Competitive Retail Natural Gas Brokers/Aggregators ("Application") filing from disclosure for not less than two years to protect highly confidential and proprietary commercial information included therein. The Application contains financial statements marked as Exhibits C-3 and C-5 that North Shore believes should be treated by the Commission as confidential. In support of this motion, North Shore states as follows:

Background

Rule 4901-1-24(D) of the Ohio Administrative Code ("O.A.C.") provides for the issuance of an order that is necessary to protect the confidentiality of information contained in documents filed at the Commission to the extent that state and federal laws prohibit the release of such information and where non-disclosure of the information is not inconsistent with the purposes of Title 49 of

the Revised Code ("R.C"). State law recognizes the need to protect information that is confidential in nature, and is the information in Exhibits C-2 and C-3.

Section 4928.06(F), R.C., specifically permits the Commission to grant confidentiality to competitive information:

"The Commission shall take such measures as it considers necessary to protect the confidentiality of any such information." Public non-disclosures of the information contained in Exhibit C-2 and C-3 of the application will not impair the purposes of Title 49 as the Commission and its Staff will have access to the information they need to complete the review process.

Simultaneously with the filing of this Motion, Movant has filed its Certification Application for Competitive Retail Natural Gas Brokers/Aggregators. Certain information included in the Report is, in Movant's opinion, highly sensitive confidential, trade secrets and proprietary information ("Proprietary information"). Specifically, the Movant seeks protection of the following information, which has been removed from the public version of the report and noted with a "Redaction" stamp:

1. Exhibit 1 discloses North Shore's financial statements ("Financial Data")

The Financial Data is confidential and proprietary. For the reasons outlined below, North Shore request confidential treatment of all the Financial Data.

- a. The Financial Data is Confidential

The Financial Data contains confidential financial information. North Shore maintains that this data, by definition, qualifies for protection. Further, this data could be utilized to determine market share, sales and "financial success."

The Financial Data is not information that North Shore has, or would, disclose to any person or entity in the public domain.

B. Disclosure of the Financial Data would harm North shore

North Shore's Financial Data is privileged and confidential commercial information, the disclosure of which to competitors would cause competitive harm to North Shore. The Financial Data is on its face confidential, and also could be used to derive confidential trade information and market sensitive information regarding North Shore's provision of services to customers in Ohio.

The electric service industry is highly competitive, and it is imperative that public disclosure of confidential information contained in the Financial Data be avoided for a period of at least two (2) years because of the harm which disclosure of such information would likely cause North Shore.

The Financial Data can be used by North Shore's competitors, or others, to determine North Shore's market share, sales success, product-line success, and business structure via an understanding of its contractual relationship. This information is not publicly available, and it is not information North Shore would willingly share with its competitors.

Disclosure of North Shore's Financial Data will cause North Shore competitive harm. North Shore's competitors can use that information to attempt to drive North Shore out of business. Accordingly, North Shore seeks the requested protection.

Disclosure of commercial information like North Shore's financial statements and market share data is harmful to a company like North Shore because it gives North Shore's competitors insight into information about North Shore's relative position in the marketplace. It lets those competitors know where North Shore is focusing its efforts.

Once North Shore's competitors become aware of North Shore's market, sales success, product-line success, and business structure, those competitors would be able to adjust their marketing strategies to respond to competition from North Shore. Competition is good; unfair competition is not. Utilizing confidential financial data and market share data to a competitor's detriment is not fair. Further, proprietary financial data can be utilized to price North Shore out of the market in a specific area in order for the competitor to gain market share. North Shore is of the opinion that disclosure of its Financial Data will not only be detrimental to North Shore and its competitive well-being, but ultimately to customers as well when a lack of competition results in price increases.

In summary, the harm that would result if North Shore's Financial Data is not treated as proprietary is twofold. First, the data could be used by North Shore's competitors to determine North Shore's market share, sales volumes, product-lines and product-line success, and business structure. This information could be unfairly and improperly used by the competitors against North Shore in several ways, including via misleading advertising or predatory pricing targeted and intended to diminish North Shore's market share and drive them out of the market completely. This will cause the second harmful result: decreased

competition and increased prices. North Shore maintains that by definition, the Financial Data is worthy of protection without any further showing. As such, North Shore respectfully requests that the Commission enter an Order granting proprietary status to North Shore's Financial Data for a period of two years, without hearing.

WHEREFORE, North Shore Energy Consulting, LLC, respectfully requests that the Commission enter an Order, without hearing, protecting from disclosure for a period of not less than two (2) years, the above references information that was submitted as part of North Shore's Certification Application for Competitive Retail Natural Gas Brokers/Aggregators.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Chris Greulich", written in a cursive style.

North Shore Energy Consulting, LLC

Chris Greulich

VERIFICATION

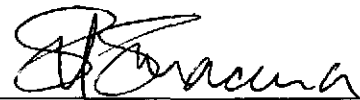
STATE OF Ohio)
COUNTY OF Summit

Chris Greulich, being first duly sworn, deposes and says that she/he
North Shore Energy Consulting, LLC
is [the] [a(n)] _____ [of][for] [Applicant]; that he/she has read the
foregoing Application of [Applicant], and all of the attachments accompanying
and referred to within the Application; and that the statements contained in the
Application and the attachments are true, correct and complete to the best of
[her][his] knowledge, information and belief.



[Name of person verifying application]

Subscribed and sworn to before me
this 19 day of AUG, 2011.



Notary Public

[Stamp of Notary]



SAL SARACUSA
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 11-29-14