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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE APPLICATION

OF ENERGY ALLIANCES, INC. FOR

RENEWAL OF CERTIFICATION AS A

COMPETITIVE RETAIL ELECTRIC

POWER BROKER/AGGREGATOR

CASE NO. 09-1048 -EL-AGG

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MOTION FOR PROTECTIVE ORDER

Pursuant to O.A.C. § 4901-1-24(D), Energy Alliances, 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 of Energy Alliances, Inc.'s Renewal Certification Application for Aggregators/Power Brokers (Electric). This motion is accompanied by the attached Memorandum in Support.

Respectfully submitted,

Dominick S. Gerace (0082823) Taft Stettinius & Hollister LLP 425 Walnut Street, Suite 1800 Cincinnati, OH 45202-3957 (513) 381-2838 – Phone

(513) 381-2838 – Phone (513) 381-0205 – Fax

E-mail: dgerace@taftlaw.com

Attorney for the Applicant

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MEMORANDUM IN SUPPORT OF MOTION FOR PROTECTIVE ORDER BACKGROUND

Energy Alliances, Inc. has submitted a Renewal Certification Application for Aggregators/Power Brokers (Electric). As part of those Applications, Energy Alliances, Inc. is required to provide audited financial statements and a credit report via Exhibits C-3, C-5, C-6, and C-7. Energy Alliances, 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.

THE NEED FOR A PROTECTIVE ORDER

Exhibits C-3, C-5, C-6, and C-7 contain sensitive financial information, and the disclosure of such information to the general public or competitors would be extremely detrimental to Energy Alliances, Inc. Due to the sensitive nature of this confidential and proprietary information, it is appropriate for the Commission to limit access to the information. The exhibits should be used solely by the Commission in exercising its governmental functions in considering Energy Alliances, Inc.'s Applications. There is no legitimate purpose or public interest to be served in disclosing the confidential exhibits to any of Energy Alliances, Inc.'s current or future competitors, or to any person other than the appropriate staff of the Commission.

Accordingly, Energy Alliances, Inc. respectfully requests that the Commission grant a Protective Order allowing Exhibits C-3, C-5, C-6, and C-7 of the Applications to be treated as confidential, thereby protecting the information contained in those documents from public disclosure.

CONCLUSION

For the foregoing reasons, Energy Alliances, Inc. respectfully requests that its Motion for Protective Order be granted.

Respectfully submitted,

Dominick S. Gerace (0082823) Taft Stettinius & Hollister LLP 425 Walnut Street, Suite 1800 Cincippati OH 45202 2057

Cincinnati, OH 45202-3957 (513) 381-2838 – Phone

(513) 381-0205 – Fax

E-mail: dgerace@taftlaw.com

Attorney for the Applicant