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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

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2014 JUN 23 PM 12:05

In the Matter of the Application of :  
Lykins Oil Company d/b/a Lykins :  
Energy Solutions for Certification as :  
An Electric Aggregator, Power Broker, :  
And Power Marketer. :

PUCO  
Case No. 14-0931-EL-CRS

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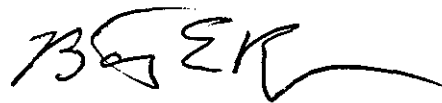
AMENDED MOTION FOR PROTECTIVE ORDER  
OF  
LYKINS OIL COMPANY d/b/a LYKINS ENERGY SOLUTIONS

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Pursuant to Rule 4901-1-24(D), Ohio Administrative Code ("OAC"), Lykins Oil Company d/b/a Lykins Energy Solutions ("Lykins"), the applicant herein, hereby moves to expand the scope of the protection originally sought in its motion for a protective order filed herein on May 22, 2014. Specifically, Lykins now also seeks to preserve the confidentiality of certain additional competitively-sensitive information filed this date in response to the Commission staff's request for additional documentation to supplement and support the information provided in Exhibit C-4 to the original application in this case. The basis for this motion is set forth in the accompanying memorandum in support. As required by Rule 4901-1-24(D)(2), OAC, three unredacted copies of the Exhibit C-4 document for which protection is sought have been filed under seal.

WHEREFORE, Lykins respectfully requests that its motion be granted.

Respectfully submitted,



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Attorney for Lykins Oil Company  
d/b/a Lykins Energy Solutions

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MEMORANDUM IN SUPPORT  
OF  
AMENDED MOTION FOR PROTECTIVE ORDER  
OF  
LYKINS OIL COMPANY d/b/a LYKINS ENERGY SOLUTIONS

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By its application filed this date in the above-captioned matter, Lykins Oil Company d/b/a Lykins Energy Solutions ("Lykins") seeks authority to provide electric aggregation, power broker, and power marketer services to customers in this state. Rule 4901:1-24-04(A), Ohio Administrative Code ("OAC"), requires that applications for certification to provide such services be made on forms supplied by the Commission. The application form for the authority requested in this case requires the applicant to "provide copies of the applicant's financial arrangements to conduct CRES as a business activity (e.g., guarantees, bank commitments, contractual arrangements, credit agreements, etc.)" as Exhibit C-4 to the application.

In Exhibit C-4 to its application, Lykins explained that it currently has a \$50 million credit facility with US Bank and Wells Fargo Bank, of which, Lykins is currently using approximately \$25 million. Thus, Lykins indicated that it would not require any additional financial arrangements to provide the service that service that it's the subject of the application. In the course of its review of the application, the Commission staff requested that Lykins provide

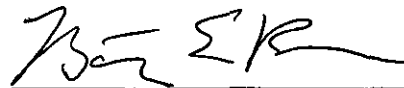
documentation confirming the amount of the credit facility and the expiration date of the arrangement. In response thereto, Lykins has, this date, filed a Revised Exhibit C-4 to the application, which includes, *inter alia*, a "First Amendment to Financing Arrangement" that shows, in Paragraph 3 thereof, that the available credit amount is \$50 million. However, this document also shows interest rates applicable to the revolving credit availability, which Lykins regards as competitively-sensitive information. Thus, Lykins has redacted this interest rate information from the public version of Revised Exhibit C-4, and by the foregoing amended motion for a protective order, asks the protection sought through its earlier motion to prevent disclosure of financial statement submitted as Exhibit C-3 and C-5 to the application be expanded to cover this information as well.

Lykins notes that motions to preserve the details of financing arrangements presented in CRES provider certification applications are routinely granted protection by the Commission. Moreover, under pending Rule 4901:1-24-08, OAC, the filing of required financial exhibits under seal – including Exhibit C-4 – will automatically result in the exhibits being accorded protected status without the need for filing a motion for a protective order. Lykins submits that disclosure of this interest rate information could harm its competitive position, not only the Ohio retail electric market, but in the petroleum products market, which continues to be a primary focus of its business. Thus, Lykins, for all those reasons previously stated in the memorandum accompanying its original motion for a protective order, respectfully requests that this competitively-sensitive information be accorded confidential treatment pursuant to Rule 4901-1-24(D), OAC, based on its determination that such information constitutes a "trade secret, or other confidential research, development, (or) commercial information under Ohio law."

In accordance with Rule 4901-1-24(D)(1), OAC, the public version of the document containing information for which protection is requested has been with only such redactions as are essential to prevent disclosure of the confidential information. As required by Rule 4901-1-24(D)(2), OAC, three unredacted copies of the Exhibit C-4 document for which protection is sought have been filed under seal.

WHEREFORE, Lykins respectfully requests that the Commission grant the foregoing amended motion.

Respectfully submitted,



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