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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
Scioto Energy, LLC for Certification)
as a Competitive Retail Electric Service)
Power Broker/Aggregator)

Case No. 09-869-EL-AGG

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MOTION FOR PROTECTIVE ORDER

Scioto Energy, LLC ("Scioto") respectfully moves the Public Utilities Commission of Ohio, pursuant to 4901:1-24-07 and 4901:1-24-08 of the Ohio Administrative Code ("O.A.C."), for a protective order to keep two financial exhibits (Exhibit C-3 and C-5) submitted as part of its application to renew its certificate as a competitive retail electric service power broker/aggregator confidential and not part of the public record. The reasons underlying this motion are detailed in the attached Memorandum in Support.

Respectfully submitted,


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MEMORANDUM IN SUPPORT

Scioto is not a publicly traded company and, accordingly, its financial information is not publicly available. Therefore, as set forth in greater detail below, Scioto requests that the information it designated as confidential in its Renewal Certification Application to provide aggregation and power broker services filed October 13, 2017, specifically Exhibits C-3 and C-5, be protected from public disclosure. The information for which protection is sought covers financial statements (C-3) and forecasted financial statements (C-5). Such information if released to the public would harm Scioto by providing its competitors proprietary information in what is designated by statute to now be a competitive service.

Rule 4901:1-24-08 (A) states "An applicant may file financial statements, financial arrangements, and forecasted financial statements under seal. If these exhibits are filed under seal, they will be afforded protective treatment for a period of six years from the date of the certificate for which the information is being provided."

Pursuant to the above, Scioto respectfully requests such applicable financial statements, namely Exhibits C-3 and C-5, be maintained under seal and afforded protective treatment for the promulgated six year period.

Respectfully submitted,



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