

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Renewal Application)
of Scioto Energy, LLC for Certification) Original Case No. 14-0546-GA-AGG
as a Competitive Retail Natural Gas)
Broker/Aggregator)

MOTION FOR PROTECTIVE ORDER

Scioto Energy, LLC (“Scioto Energy”) respectfully moves the Public Utilities Commission of Ohio, pursuant to 4901:1-27-07 and 4901:1-27-08 of the Ohio Administrative Code, for a protective order to keep two financial exhibits (Exhibit C-2 and Exhibit C-3) submitted as part of its application to renew its certificate as a competitive retail natural gas 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,

/s/ Shamus B. Cassidy

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MEMORANDUM IN SUPPORT

Scioto Energy is not a publicly traded company and, accordingly, its financial information is not publicly available. Therefore, as set forth in greater detail below, Scioto Energy requests that the information it designated as confidential in its Renewal Certification Application to provide retail natural gas broker services filed in May 2022, specifically Exhibits C-2 and C-3, be protected from public disclosure. The information for which protection is sought covers financial statements (C-2) and forecasted financial statements (C-3). Such information if released to the public would harm Scioto Energy by providing its competitors proprietary information in what is designated by statute to now be a competitive service.

Rule 4901:1-27-08 (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 Energy respectfully requests such applicable financial statements, namely Exhibits C-2 and C-3, be maintained under seal and afforded protective treatment for the promulgated six-year period.

Respectfully submitted,

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Summary: Motion Motion for Protective Order electronically filed by Mr. Shamus B.
Cassidy on behalf of Scioto Energy LLC