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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of
U.S. Gas and Electric, Inc. to Provide
Competitive Retail Natural Gas Supplier
Services in the State of Ohio.

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08-601-FA-CRS

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MOTION FOR PROTECTIVE ORDER

U.S. Gas and Electric, Inc. ("USG&E"), pursuant to the Public Utility Commission of Ohio's ("Commission"), rules of practice and procedure, respectfully petitions the Commission for an order to protect the Company's proprietary Financial Statements, Financial Arrangement and Forecasted Financial Statements included in USG&E's Certification Application for Competitive Retail Natural Gas Suppliers at Exhibits C3, C4 and C5 from disclosure. In support of its Motion, USG&E states as follows;

1. USG&E's income statement, balance sheet, financial arrangements and forecasted financial statements ("Financial Statements"), constitute financial data not commonly known by or available to the public. USG&E has used its best efforts to keep and maintain such information confidential. To the best of USG&E's knowledge, current financial information has not been disclosed or released to the public;

2. The Financial Statements derive economic value from not being generally known to and not being readily ascertainable by proper means by other persons, who can

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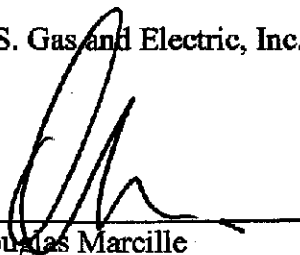
obtain economic value from their disclosure and use. Specifically, the information contained therein is extremely sensitive information that could be used by competitors to determine revenue and other information damaging to USG&E in the marketplace. Disclosure of such information would be extremely detrimental and could be used by USG&E's competitors to materially affect USG&E's ability to compete effectively; and

3. Due to the sensitive nature of this information, it is appropriate for the Commission to limit access to it. The financial statements should solely be used by the Commission in exercising its governmental functions in considering USG&E's Application for operating authority. There is no legitimate purpose or public interest to be served in disclosing the financial statements to USG&E's competitors or, indeed, to any person other than the appropriate staff of the Commission.

For the foregoing reasons, U.S. Gas and Electric, Inc. respectfully requests that the commission grant a Protective Order allowing its financial statements to be treated as confidential.

Respectfully submitted this 14th day of May 2008.

U.S. Gas and Electric, Inc.



Douglas Marcille
President

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