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STATE OF OHIO
PUBLIC UTILITIES COMMISSION

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Liberty Power Delaware LLC

Renewal Application for Retail
Generation Providers and Power
Marketers

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Docket No.

MOTION FOR CONFIDENTIAL TREATMENT AND PROTECTIVE ORDER

Liberty Power Delaware LLC, ("Liberty Power") pursuant to Rule 4901-1-24 of the Ohio Administrative Code, hereby respectfully requests that the Public Utilities Commission of Ohio ("Commission") provide confidential treatment of portions of its Renewal Application for Retail Generation Providers and Power Marketers ("Application") filed with the Commission on this day. Liberty Power respectfully requests that the Commission treat portions as confidential and these portions of the Application are not made part of the public record. In support of its Motion, Liberty Power states as follows:

1. Liberty Power is a Power Marketer in the State of Ohio under its Power Marketer license Certificate #07-137(1), effective February 07, 2007, and has filed a Renewal Application for Retail Generation and Power Marketers.
2. Portions of the Application contain highly confidential and proprietary business information. Specifically, the Application contains Liberty Power's year-end financial statements for years ending 2006 and 2007.
3. Item C-4 of the Application requests "copies of the applicant's financial arrangements to conduct CRES as a business activity". The information contained in the agreements dictating Liberty Power's financial arrangements are highly confidential and proprietary, the disclosure of this information would cause harm to Liberty Power in the highly competitive market of energy supply. In addition, disclosure of this information could cause harm to the credit provider and would be subject to their prior written approval.

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4. Liberty Power requests that the protective order be in full effect for **five** years from the date of submission.

WHEREFORE, Applicant Liberty Power Delaware LLC respectfully requests that the Chief Clerk of the Commission treat Section C of the Application as Confidential and sealed under protective order and not made part of the public record of Liberty Power's application and not posted on the websites of the Illinois Commerce Commission or the Office of the Clerk.

Dated:

Respectfully submitted,

Liberty Power Delaware LLC

By: 
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