

FILE

4

09-1854-GA-AGG



Chuck Stockhausen
PUBLIC UTILITIES COMMISSION OF OHIO
DOCKETING DIVISION
180 East Broad Street
Columbus, OH 43215-3793

Re: 09-1854-GA-AGG

November 8, 2011

Chuck,

Enclosed are the following:

Motion for Protective Order

3 complete copies of the Gas Broker/Agg. renewal package including the documents under seal of protective order.

7 copies of the Gas Broker/Agg. renewal package excluding the documents under seal of protective order.

Thank you very much for your assistance. If you need to contact me, please call 513-794-5555.

Sincerely,

Mark Bishop
Secretary

Cc: SF, BG

RECEIVED-DOCKETING DIV
2011 NOV -9 AM 11:59
PUCO

This is to certify that the images appearing are an
accurate and complete reproduction of a case file
document delivered in the regular course of business.
Technician IN Date Processed NOV 09 2011

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

IN THE MATTER OF THE APPLICATION)
OF ENERGY ALLIANCES, INC. FOR)
RENEWAL OF CERTIFICATION AS A)
COMPETITIVE RETAIL NATURAL GAS)
BROKER/ AGGREGATOR)

) **CASE NO. 09-1854 -GA-AGG**
)
)
)
)
)
)

MOTION FOR PROTECTIVE ORDER

Pursuant to O.A.C. § 4901-1-24(D), Energy Alliances, Inc. moves for a protective order to prevent public disclosure of the confidential and proprietary financial information included as Exhibits C-3, C-5, C-6, and C-7 of Energy Alliances, Inc.'s Renewal Certification Application for Competitive Retail Natural Gas Brokers/Aggregators. This motion is accompanied by the attached Memorandum in Support.

Respectfully submitted,



Dominick S. Gerace (0082823)
Taft Stettinius & Hollister LLP
425 Walnut Street, Suite 1800
Cincinnati, OH 45202-3957
(513) 381-2838 -- Phone
(513) 381-0205 -- Fax
E-mail: dgerace@taftlaw.com

Attorney for the Applicant

MEMORANDUM IN SUPPORT OF MOTION FOR PROTECTIVE ORDER

BACKGROUND

Energy Alliances, Inc. has submitted a Renewal Certification Application for Competitive Retail Natural Gas Brokers/Aggregators in the State of Ohio. As part of those Applications, Energy Alliances, Inc. is required to provide audited financial statements and a credit report via Exhibits C-3, C-5, C-6, and C-7. Energy Alliances, Inc., an Ohio Corporation, is a privately held company and is not required to file financial information with the United States Securities and Exchange Commission, and does not otherwise disclose financial information to the public.

THE NEED FOR A PROTECTIVE ORDER

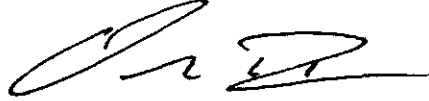
Exhibits C-3, C-5, C-6, and C-7 contain sensitive financial information, and the disclosure of such information to the general public or competitors would be extremely detrimental to Energy Alliances, Inc. Due to the sensitive nature of this confidential and proprietary information, it is appropriate for the Commission to limit access to the information. The exhibits should be used solely by the Commission in exercising its governmental functions in considering Energy Alliances, Inc.'s Applications. There is no legitimate purpose or public interest to be served in disclosing the confidential exhibits to any of Energy Alliances, Inc.'s current or future competitors, or to any person other than the appropriate staff of the Commission.

Accordingly, Energy Alliances, Inc. respectfully requests that the Commission grant a Protective Order allowing Exhibits C-3, C-5, C-6, and C-7 of the Applications to be treated as confidential, thereby protecting the information contained in those documents from public disclosure.

CONCLUSION

For the foregoing reasons, Energy Alliances, Inc. respectfully requests that its Motion for Protective Order be granted.

Respectfully submitted,



Dominick S. Gerace (0082823)
Taft Stettinius & Hollister LLP
425 Walnut Street, Suite 1800
Cincinnati, OH 45202-3957
(513) 381-2838 – Phone
(513) 381-0205 – Fax
E-mail: dgerace@taftlaw.com

Attorney for the Applicant