



Attorneys at Law



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October 7, 2013

Ms. Betty McCauley Public Utilities Commission 180 East Broad Street, 11th Floor Columbus, OH 43215

Re: Renewal Certification Application of Alternative Utility Services, Inc. to

Renew as a Competitive Retail Natural Gas Broker/Aggregator

Case No. 11-5473-GA-AGG

Dear Ms. McCauley:

On October 1, 2013, Applicant filed its Renewal Application for Certification as an Aggregator/Power Broker. Enclosed is a Motion for Protective Order with respect to the content contained in Exhibit C-3 and C-5 of that renewal application. The exhibits submitted are to be protected in response to Question Nos. C-3 and C-5 and identified as Financial Statements and Forecasted Financial Statements. Please return a date-stamped copy of the motion in the enclosed self-addressed, stamped envelope once it has been filed.

Thank you for your anticipated cooperation.

Very truly yours,

RODERICK LINTON BELFANCE, LLP

William G Chris

WGC:hjk Enclosures

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

IN THE MATTER OF THE RENEWAL)	CASE NO. 11-5473-GA-AGG
CERTIFICATION APPLICATION OF)	
ALTERNATIVE UTILITY SERVICES, INC.)	
TO RENEW AS A COMPETITIVE RETAIL)	
NATURAL GAS BROKER/AGGREGATOR)	

MOTION FOR PROTECTIVE ORDER

Applicant Alternative Utility Services, Inc. (hereinafter, "AUS" or "Applicant") by and through counsel, moves pursuant to Ohio Administrative Code 490-1-24(D), for the entry of a Protective Order to designate as confidential its responses to Questions C-3 and C-5 in the Commission's Renewal Application as a Natural Gas Broker/Aggregator. These questions seek information and records which AUS considers confidential and which are maintained as confidential by the Company. Public disclosure of this information could be potentially harmful to AUS's competitive position as a natural gas broker/aggregator. AUS filed its Public Renewal Certification Application in this proceeding on October 1, 2013.

AUS requests that the Protective Order be effective for a period of 24 months from the effective date of the certificate issued to it in this proceeding.

Respectfully submitted,

RODERICK L'INTON BELFANCE, LLP

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Attorney for Plaintiff

MEMORANDUM IN SUPPORT

Alternative Utility Services, Inc., is an Illinois corporation registered as a foreign for profit corporation with the State of Ohio on July 5, 2011, through the Ohio Secretary of State's Office as Entity No. 2032329. In response to Questions C3 and C-5 in the Commission Renewal Application, as a competitive retail natural gas broker/aggregator, filings were made of materials that AUS considers as being confidential and which are maintained as such by AUS. Public disclosure of these records would be harmful to AUS's competitive position in the industry. The disclosure of this information in the competitive retail natural gas broker/aggregator position would negatively affect AUS's competitive position.

This request for Protective Order is reasonable, necessary and will not prejudice any other party or individual, but in fact will allow AUS to continue in its ability to effectively compete in an area which will better serve Ohio consumers.

For the aforementioned reasons, Alternative Utility Services, Inc. respectfully requests that a Protective Order be issued which permits its previously filed responses to Question C-3 and C-5 to be filed under seal and for those matters to be treated in a confidential manner.

Respectfully submitted,

RODERICK LINTON BELFANCE, LLP

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