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September 29, 2014

The Public Utilities Commission of Ohio Docketing Division Attention: Barcy F. McNeal, Secretary 180 East Broad Street, 11th Floor Columbus, Ohio 43215

RE: Case No. 06-791-GA-CRS Future Now Energy LTD (CRNGS Renewal Certification Application)

Secretary McNeal:

This office represents Future Now Energy LTD ("FNE"), applicant in the above-captioned matter. The renewal certification application was filed on September 12, 2014. Certain exhibits called for by the application (specifically Exhibits C-3, C-4, and C-5) contain confidential information and were separately filed under seal. A Motion for Protective Order as relates to those exhibits was also filed and is pending.

Following its initial review, Staff has requested additional information as relates to Exhibit C-4. As the additional information requested by Staff is also view as confidential, the original and two (2) copies of Supplemental Exhibit C-4 are being submitted under seal. The original and one copy of the Amended Motion for Protective Order as relates to Supplemental Exhibit C-4 is also enclosed.

David A. Turano

EWB/bkf

Enclosures

cc: Future Now Energy LTD.

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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO



In the Matter of the Application of)Future Now Energy LTD. for Renewal)Certification to Provide Competitive Retail)Natural Gas Service in Ohio)

Case No. 06-791-GA-CRS

AMENDED MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 4901-1-24(D), Ohio Administrative Code, on September 12, 2014, Future Now Energy LTD ("FNE") filed its Motion for Protective Order for the confidential information contained in Exhibits C-3, C-4, and C-5 to its Renewal Certification Application filed that same date with the Commission's Docketing Division. The motion is currently pending.

At the request of Staff, FNE has filed this date, under seal, Supplement Exhibit C-4 to its Renewal Certification Application. Since the additional information being submitted is viewed as confidential, FNE is amending its Motion for Protective Order to include its Supplemental Exhibit C-4.

Respectfully submitted,

David A. Turano (0025819) BEERY & SPURLOCK CO., L.P.A. 275 East State Street Columbus, Ohio 43215 (614) 228-8575 (614) 228-1408 Email: <u>dturano@midohiolaw.com</u> Attorney for Future Now Energy LTD.

MEMORANDUM IN SUPPORT OF AMENDED MOTION FOR PROTECTIVE ORDER

By this reference, FNE adopts and incorporates as if fully rewritten herein the reasoning set forth in its Motion for Protective Order on September 12, 2014 seeking protective treatment of the information contained in Exhibits C-3, and C-5 of its Renewal Certificate Application. The same reasoning applies with equal force to the confidential information contained in Supplemental Exhibits C-4. The information contained in Supplemental Exhibits C-3, C-4, and C-5, represents confidential business information, qualifies as trade secrets under Ohio law, and is to be protected from public disclosure.

Wherefore, FNE respectfully requests that: (1) its Motion for Protective Order of September 12, 2014 to be amended to include the information contained in Supplemental Exhibit C-4; (2) a determination be made that the information contained in Supplemental Exhibit C-4, as well as Exhibits C-3, C-4, and C-5, constitutes "trade secrets" as defined under Ohio law and Commission rule; and (3) the designated information be protected from public disclosure by granting the requested Motion for Protective Order.

Respectfully submitted,

David A. Turano (0025819) BEERY & SPURLOCK CO., L.P.A. 275 East State Street Columbus, Ohio 43215 (614) 228-8575 (614) 228-1408 Email: <u>dturano@midohiolaw.com</u> Attorney for Future Now Energy LTD.