2016 MAR - 1 PM 3:26
PUCO

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

| IN THE MATTER OF THE APPLICATION | ) |                        |
|----------------------------------|---|------------------------|
| OF ENERGY ALLIANCES, INC. FOR    | ) |                        |
| RENEWAL OF CERTIFICATION AS A    | ) | CASE NO. 14-492-GA-AGG |
| COMPETITIVE RETAIL NATURAL GAS   | ) |                        |
| BROKER/AGGREGATOR                | ) |                        |

## 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,

Jay B. Stolkin (0092686)
DINSMORE & SHOHL LLP
255 E. Fifth Street, Suite 1900
Cincinnati, OH 45202
(513) 977-8200 – phone
(513) 977-8141 – fax
jay.stolkin@dinsmore.com

Attorney for the Applicant

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 pate Processed MAR 0 1 2016

## 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 Alliance'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,

Jay B. Stolkin (0092686)
DINSMORE & SHOHL LLP
255 E. Fifth Street, Suite 1900
Cincinnati, OH 45202
(513) 977-8200 – phone
(513) 977-8141 – fax
jay.stolkin@dinsmore.com

Attorney for the Applicant

10155133V1