

## BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of Calpine Energy :  
 Solutions, LLC's Alternative Energy : Case No. 18-0689-EL-ACP  
 Resource Portfolio for 2017 :

**CALPINE ENERGY SOLUTIONS LLC'S MOTION FOR A PROTECTIVE ORDER**

Calpine Energy Solutions, LLC ("Calpine Solutions"), pursuant to Ohio Administrative Code ("O.A.C.") §4901-1-24(D)<sup>1</sup>, moves for a protective order to keep certain information related to its Alternative Energy Resources Portfolio Report, for the 2017 calendar year ("AERP"), compliance obligations confidential and not part of the public record. A Memorandum in Support is attached to this Motion and should be incorporated herein.

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Respectfully submitted,

/s/ Justin M. Dortch

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 CALPINE ENERGY SOLUTIONS, LLC

<sup>1</sup> Consistent with the requirements of O.A.C. §4901-1-24(D), two (2) un-redacted copies of Calpine's AERP are submitted under seal.

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This definition clearly reflects the state policy favoring the protection of trade secrets such as the confidential financial and proprietary information which is the subject of this Motion. In this case, the ten year forecast of solar and non-solar renewable energy credits ("Forecast") contains confidential and proprietary information and constitutes a trade secret. Specifically, the Forecast's disclosure could give competitors an advantage that would hinder Calpine Solutions' ability to compete. In addition, public disclosure of the Forecast is not likely to assist the Commission in carrying out its duties because the Commission, and its Staff, possesses an un-redacted copy of this information.

WHEREFORE, for the reasons stated above, Calpine Solutions requests that the commission GRANT its Motion for a protective order and maintain the Forecast under seal.

Respectfully submitted,

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