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STATE OF OHIO
PUBLIC UTILITIES COMMISSION OF OHIO

Marketing Systems Group, LLC :
: :
Certification Application for :
Aggregators/Power Brokers :

Case No. 14-1114-EL-AGG

PUCO

2020 JUN 23 PM 2:34

MOTION FOR CONFIDENTIAL TREATMENT

Marketing Systems Group, LLC ("MSG" or "IION" – 2301503) hereby requests the Public Utilities Commission of Ohio ("Commission") to enter an order pursuant to 4901-1-24 of the Ohio Administrative Code to protect certain confidential and proprietary data and information of MSG that has been included with MSG Certification Application for Aggregators/Power Brokers. Specifically, MSG requests that the Commission treat Exhibits C-3 and C-5 as confidential and proprietary.

Section 4901-1-24 of the Ohio Administrative Code exempts from public disclosure "trade secrets and commercial or financial information obtained from a person or business where the trade secrets or commercial or financial information are furnished under a claim that they are proprietary, privileged or confidential, and that disclosure of the trade secrets or commercial or financial information would cause competitive harm to the person or business, and only insofar as the claim directly applies to the records requested." The confidential financial information of MSG clearly falls within this exception.

WHEREFORE, MSG respectfully requests that the Commission enter an Order, without hearing, protecting the confidentiality of MSG information in MSG Certification Application for Retail Generation Suppliers, Power Marketers, and Power Brokers, and that such information be kept under seal as "Confidential" and not be made a part of the public record, and not be published or posted on the websites of the Public Utilities Commission of Ohio.

DATED this 18th day of June, 2020.

Respectfully submitted,
Marketing Systems Group, LLC

By: 

Alexander Rozenblat, Chief Legal Officer
Marketing Systems Group, LLC
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Technician ADH Date Processed 6/23/20

VERIFICATION

STATE OF ILLINOIS

: SS CHICAGO

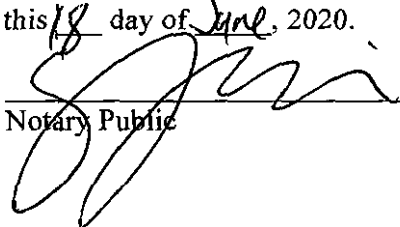
COUNTY OF COOK

Alexander Rozenblat, being first duly sworn, deposes and says that he is the Chief Legal Officer of Marketing Systems Group, LLC; that he has read the foregoing Motion for Confidential Treatment, and that all of the statements contained in said Motion are true, correct and complete to the best of his knowledge, information and belief.



Alexander Rozenblat
Chief Legal Officer
Marketing Systems Group, LLC

Subscribed and sworn to before me
this 18 day of June, 2020.


Notary Public