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B. H. & BINGHAM

NO. 9618 P. 4

FAX

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

SunSea Energy OH, LLC

Natural Gas Supplier Application

Case No.

20-1268-GA-CRS

MOTION FOR CONFIDENTIAL TREATMENT

SunSea Energy OH, LLC ("Applicant") hereby respectfully requests this honorable Public Utilities Commission of Ohio ("Commission") to enter an order pursuant to the Ohio Administrative Code Rule 4901-1-24(D) to protect certain confidential and proprietary data and information of the Applicant that has been included with the Applicant's submission of its Competitive Retail Natural Gas Supplier Application ("Application"). Specifically, the Applicant requests that the Commission treat Exhibits B-2, C-3, C-4, C-5, C-6 and C-7 as confidential and proprietary. Each of these exhibits contains commercially sensitive and proprietary information that constitutes a trade secret.

The Applicant is not a publically traded company and, therefore, its personal and business financial information is highly confidential and is available only to those individuals on a need to know basis. The Applicant is concerned that the disclosure, of the above-mentioned exhibits would provide the Applicant's competitors with an unfair advantage and valuable insight into the Applicant's financial information and business activities. Therefore, the Applicant believes that the disclosure of such personal and business financial information could impede its launch and growth and would likely result in substantial economic damages to the Applicant.

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For these reasons, the Applicant treats this information as proprietary and confidential in the ordinary course of its business. Accordingly, the value of the Applicant's proprietary and confidential exhibits referenced herein can only be protected if they are guarded from public disclosure and maintained under seal.

WHEREFORE, the Applicant respectfully requests that the Commission enter an Order, without hearing, protecting the confidentiality of the Applicant's Exhibits B-2, C-3, C-4, C-5, C-6 and C-7 contained in its Application, and that such information be kept under seal as "Confidential" and not be made a part of the public record, and not be published or posted on the websites of the Public Utilities Commission of Ohio.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 13th day of July, 2020.

Respectfully submitted,
SunSea Energy OH, LLC

By: K.C. Hairston

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THE SUPREME COURT *of* OHIO
OFFICE OF ATTORNEY SERVICES

IN THE MATTER OF THE APPLICATION OF

Kenneth Hairston

FOR PRO HAC VICE REGISTRATION

per Gov. Bar R. XII, Section 2(A)(3)

Certificate of
PRO HAC VICE
REGISTRATION

2020

Registration Number:
PHV- 21025-2020

Kenneth Hairston

_____, having met the requirements of, and found to be in full compliance with, Section 2(A)(3) of Rule XII of the Rules for the Government of the Bar of Ohio, is hereby issued this certificate of pro hac vice registration in the state of Ohio.

To receive permission to appear pro hac vice in an Ohio proceeding, a motion requesting such permission must be filed with the tribunal in accordance with Section 2(A)(6) of Rule XII of the Rules for the Government of the Bar of Ohio.



Gina White Palmer
Director, Attorney Services

Expires December 31, 2020