

i.e., by the employees; (3) the precautions taken by the holder of the trade secret to guard the secrecy of the information; (4) the savings effected and the value to the holder in having the information as against competitors; (5) the amount of effort or money expended in obtaining and developing the information; and (6) the amount of time and expense it would take for others to acquire and duplicate the information.

State ex rel. The Plain Dealer v. Ohio Dept of Ins., 80 Ohio St. 3d 513 (1997).

Exhibits B-2, C-2, C-3, C-5, and C-9 to the Renewal Application contain highly confidential trade secret information. First, Inspire does not enclose the information contained in the Exhibits to anyone outside of the company other than its attorneys and accountants. Second, within the company, Inspire only discloses this information to its management team. Third, Inspire has taken appropriate precautions to guard the secrecy of the information including stamping it as confidential in the ordinary course of business and filing it under seal in other jurisdictions where it serves as an electric supplier. Finally, release of the information Inspire seeks to protect is likely to result in a competitive disadvantage, as it contains the intimate details of Inspire's current and projected finances and its strategic allocation of resources for the Ohio electric market.

For the foregoing reasons, the Commission, pursuant to Rule 4901-1-24(D), should grant Inspire's motion for a protective order.

Dated: March 22, 2021

Respectfully submitted,

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Summary: Motion Motion for Protective Order electronically filed by Ms. Valerie A Cahill on behalf of Inspire Energy Holdings, LLC