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Via E-Filing

July 13, 2022

Barcy McNeal, Commission Secretary
Public Utilities Commission of Ohio
180 East Broad Street, 11th Floor
Columbus, OH 43215-3793
Attention: Docketing Division

RE: Case No. 22-0598-TP-ACE: Application of BIF IV Intrepid OpCo LLC to Provide Telecommunications Services Throughout the State of Ohio

MOTION FOR PROTECTIVE ORDER

Dear Secretary McNeal:

On behalf of BIF IV Intrepid OpCo LLC ("Applicant"), attached for electronic filing is Applicant's Motion for Protective Order seeking confidential treatment and a protective order for **Confidential Exhibit H-3** to the above referenced application, which has been electronically filed with the Commission via the Docketing Information System in Case No. 22-0598-TP-ACE.

Please acknowledge receipt and acceptance of this filing. Should you have any questions concerning this filing, please do not hesitate to contact my colleague, Brett Ferenchak, at (202) 373-6697.

Respectfully submitted,

/s/ Doriyon Glass

Doriyon Glass (OH Bar # 98149)

Counsel for BIF IV Intrepid OpCo LLC

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Application of)	
)	
BIF IV Intrepid OpCo LLC)	
)	Case No. 22-0598-TP-ACE
for a Certificate of Public Convenience and)	
Necessity to Provide Telecommunications)	
Services throughout the State of Ohio)	
)	
)	

BIF IV Intrepid OpCo LLC (“Applicant”), by its attorneys and pursuant to OAC 4901-1-24(D), moves for a protective order to prevent public disclosure of the confidential and proprietary financial information provided as **Confidential Exhibit H-3** in the above-referenced application. In support of this Motion, Applicant states as follows:

2. Applicant 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 its financial information to the public.

4. The Confidential Exhibit derives economic value from not being generally known to and not being readily ascertainable by proper means by another person who can obtain economic

value from their disclosure and use. Specifically, the information contained therein is extremely sensitive financial information that could be used by competitors to determine revenue and other information damaging to the Applicant. Disclosure of such information would be extremely detrimental and could be used by the Applicant 's competitors to materially affect the Applicant 's ability to compete effectively.

5. Due to the sensitive nature of the Confidential Exhibit, it is appropriate for the Commission to limit access to it. The Confidential Exhibit should solely be used by the Commission in exercising its governmental functions in considering the Application. There is no legitimate purpose or public interest in disclosing the Confidential Exhibit to the Applicant's current or future competitors or to any person other than the appropriate staff of the Commission.

WHEREFORE, BIF IV Intrepid OpCo LLC respectfully requests that the Commission grant a Protective Order allowing **Confidential Exhibit H-3** of the Application to be treated as confidential.

Respectfully submitted,

/s/ Doriyon Glass

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Counsel for BIF IV Intrepid OpCo LLC

Dated: July 13, 2022

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

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in

Case No(s). 22-0598-TP-ACE

Summary: Motion for Protective Order electronically filed by Ms. Trina Kwon on
behalf of BIF IV Intrepid OpCo LLC