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ILLINOIS COMMERCE COMMISSION

ORIGINAL

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

GDF Suez Energy Resources NA, Inc.	§	
	§	
Petition Requesting Confidential Treatment	§	
of Resumes of Key Management Personnel	§	**Docket 05-0257**
from GDF Suez Energy Resources NA, Inc.'s	§	
Application for Certificate of Service Authority	§	
under Section 16-115 of the Public Utilities Act	§	

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ILLINOIS COMMERCE COMMISSION

PETITION REQUESTING CONFIDENTIAL TREATMENT OF RESUMES OF KEY MANAGEMENT PERSONNEL FROM GDF SUEZ ENERGY RESOURCES NA, INC.'S APPLICATION FOR CERTIFICATE OF SERVICE AUTHORITY UNDER SECTION 16-115 OF THE PUBLIC UTILITIES ACT

GDF Suez Energy Resources NA, Inc., *formerly Suez Energy Resources NA, Inc.* (Suez), hereby petitions the Illinois Commerce Commission to protect from disclosure confidential and proprietary information submitted as a requisite part of Suez's Application for Certificate of Service Authority under Section 16-115 of the Public Utilities Act to become a licensed ARES (Alternative Retail Electric Supplier) in Illinois.

On April 12, 2005, Suez filed its Application for Certificate of Service Authority under Section 16-115 of the Public Utilities Act (the "Application") with the Illinois Commerce Commission (ICC) to provide retail electric supply services to commercial and industrial customers in the State of Illinois. As required by Section 21 of the Application, Suez demonstrated that it met the managerial qualifications set forth in Part 451.240 of the Public Utilities Act by submitting eight (8) resumes of key management personnel. This information became public when it was posted through the e-Docket database on the ICC website. Due to the recent significant increase in identity theft and illegal impersonation, Suez believes it is exceptionally imperative to safeguard the personal and professional information of its key management personnel. The harm of identity theft, invasion of privacy, or illegal impersonation may result from the continued public disclosure of such information.

Pursuant to 83 Ill. Adm. Code Section 451.60, the ICC's administrative rules provide that: "If an applicant or ARES believes any of the information to be disclosed by an applicant or ARES is privileged or confidential, the applicant or ARES should request that the Commission enter an order to protect the confidential, proprietary or trade secret nature of any data, information or studies pursuant to 83 Ill. Adm. Code 200.430."

Accordingly, Suez respectfully requests that the resumes of the key personnel identified in Attachment 6 of the Application be prohibited from public disclosure for five (5) years [proposed

expiration date, July 1, 2014] on the grounds that they are of a proprietary nature and contain detailed personal and professional information that, publicly disclosed, constitute an unwarranted invasion of privacy. These resumes contain confidential and private information including, but not limited to: contact information; educational backgrounds including curriculum majors/minors and grade point averages; military backgrounds; detailed listings of previous employment; detailed tasks, roles and positions in previous employment; listings of memberships in professional organizations; and other personal and professional affiliations. Public disclosure of such information endangers the identity of the key personnel and could potentially lead to identity theft or illegal impersonation. The ICC should order confidential treatment of this information due to these existing circumstances. Specifically, the prospective harm associated with the public availability of such detailed and comprehensive information provides for the potential and opportunity to facilitate identity theft.

In the alternative, Suez respectfully requests that the personal and professional information identified in the resumes of key personnel submitted in Attachment 6 of the Application be protected from public disclosure by providing information of a limited nature, consistent with the personal and professional information that is generally disclosed in the public domain, through the submission of substitute resumes to replace the existing resumes of Attachment 6. These substitute resumes are redacted versions of the original Attachment 6 of the Application. *A substitute public version of Attachment 6 exhibiting limited information key personnel is attached hereto as Exhibit 1.*

For protection of this confidential information, Suez seeks an Order from the ICC, without hearing, protecting from disclosure, for a period of not less than five years as specified herein, the comprehensive personal and professional information contained in the Attachment 6 to Suez's Application filed in Docket 05-0257, either by order to prohibit public disclosure of Attachment 6 of the Application in its entirety, or to allow the redacted Attachment, attached hereto, to replace the existing Attachment 6 of the Application.

Respectfully submitted,
GDF Suez Energy Resources NA, Inc.

By: _____

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Dated: July 24, 2009

STATE OF ILLINOIS
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VERIFICATION

State of Texas §
§
County of Harris §

Naveen Rabie, being first duly sworn, hereby certifies that she is an Attorney for GDF Suez Energy Resources NA, Inc. and that she has read the foregoing "*Petition Requesting Confidential Treatment of Resumes of Key Management Personnel from GDF Suez Energy Resources NA, Inc.'s Application for Certificate of Service Authority under Section 16-115 of the Public Utilities Act*" and that the statements contained therein are true, correct and complete to the best of her knowledge, information and belief.

NAVEEN RABIE

Subscribed and sworn to before the this 27th day of July, 2009

[SEAL] SUSAN ROZMAN
Notary Public, State of Texas
My Commission Expires
June 12, 2010

Susan Rozman
Notary Public- State of Texas