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Consolidated Edison Solutions, Inc.)
)
Petition for Relief to Protect Portions of)
Consolidated Edison Solutions, Inc.'s)
Annual Kilowatt-Hour Report from disclosure for)
not less than two years in order to protect highly)
confidential and proprietary information.)

Docket No. 12-0225

**VERIFIED COMPLIANCE FILING REQUESTING PROPRIETARY
TREATMENT OF REDACTED INFORMATION**

Consolidated Edison Solutions, Inc. ("ConEdison Solutions") hereby petitions the Illinois Commerce Commission ("Commission") for relief to protect from disclosure for not less than two (2) years highly confidential and proprietary information contained in Consolidated Edison Solutions, Inc.'s report of its Annual 2011 Kilowatt hour sales. In support of this petition, Consolidated Edison Solutions, Inc. respectfully states as follows:

1. Consolidated Edison Solutions, Inc. is certificated as an Alternative Retail Electric Supplier ("ARES") by the Commission.
2. On March 26, 2012, ConEdison Solutions submitted (i) a confidential version and (ii) a redacted public version of its report stating the total annual kilowatt hours sold to retail customers within the Commonwealth Edison Company ("Commonwealth Edison") service territory during the preceding calendar year ("Kilowatt-Hour Report").
3. The Public Utilities Act and the Commission's Rules of Practice each recognize an ARES's right to file for protection of confidential and privileged information.
4. ConEdison Solutions' Kilowatt-Hour Report contains confidential, competitive, and market sensitive information regarding the retail electric service provided by ConEdison Solutions to non-residential customers within the Commonwealth Edison service territory that ConEdison Solutions' competitors could use to further their competitive position in the marketplace.
5. The retail electric commodity business is highly competitive, and public disclosure of the information contained in ConEdison Solutions' Kilowatt-Hour Report would likely be

detrimental to ConEdison Solutions by providing to ConEdison Solutions' competitors non-public market intelligence concerning ConEdison Solutions.

6. Specifically, competitors could use the information regarding ConEdison Solutions' market share, strength, and activity within the Commonwealth Edison service territory to adjust their own sales and marketing activities in a manner that would competitively disadvantage ConEdison Solutions when such competitors market to customers for whom Consolidated Edison Solutions, Inc. is competing to serve. Without limiting the foregoing, such information, if disclosed, would permit competitors to derive non-public information regarding ConEdison Solutions' supply planning and/or purchasing strategies.
7. ConEdison Solutions believes that two years is an appropriate period of time for the protection of the information for which confidential treatment is requested, in that disclosure of the information following such two year period is less likely to provide an advantage to ConEdison Solutions' competitors given the fact that after such passage of time, the information contained in the Kilowatt-Hour Report may not reflect ConEdison Solutions' then current market activities or strategies.

WHEREFORE, ConEdison Solutions respectfully requests that the Commission enter an order, without hearing, protecting ConEdison Solutions' Kilowatt-Hour Report from public disclosure in any form for a period of not less than two (2) years.

Respectfully submitted,
CONSOLIDATED EDISON SOLUTIONS, INC.

By: Paul F. Mapelli

Paul F. Mapelli
Vice President, General Counsel and Secretary

VERIFICATION

STATE OF NEW YORK)
COUNTY OF WESTCHESTER)

ss: Consolidated Edison Solutions, Inc.

Paul F. Mapelli, being first duly sworn, deposes and says that he is the Vice President, General Counsel and Secretary of Consolidated Edison Solutions, Inc., that he has read the foregoing Verified Compliance Filing of Consolidated Edison Solutions, Inc. and that the statements contained therein are true, correct, and complete to the best of his knowledge, information and belief.

By: *Paul F. Mapelli*

Paul F. Mapelli
Vice President, General Counsel and Secretary
Consolidated Edison Solutions, Inc.

SUBSCRIBED and SWORN to
before me this 9th day of April, 2012.

Doniyell L. Curtis
Notary Public

DONIYELL L. CURTIS
Notary Public, State of New York
No. 01CU6073950
Qualified in Queens County
Certificate Filed in New York County
Commission Expires April 29, 2014