

**STATE OF ILLINOIS**

**ILLINOIS COMMERCE COMMISSION**

**Dynegy Energy Services, LLC**  
  
**Application for Certificate of  
Service Authority under Section  
16-115 of the Public Utilities Act**

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**Docket No. 14-**  
*14-0336*

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ILLINOIS COMMERCE  
COMMISSION

**MOTION FOR CONFIDENTIAL TREATMENT**

Dynegy Energy Services, LLC ("DES"), pursuant to 83 Ill. Adm. Code § 451.60 and 83 Ill. Adm. Code § 200.430, hereby moves the Illinois Commerce Commission ("Commission") to treat certain portions identified herein of Attachment I (SBO Supporting Documents) to DES's Application for a Certificate of Service Authority ("ARES Application") pursuant to Section 16-115 of the Illinois Public Utilities Act ("Act") as confidential and to be excluded from the public domain. In support of its Motion, DES states as follows:

1. In Attachment I in the above captioned ARES Application, as part of its financial qualifications demonstration under Section 451.510(b) of Part 451 to provide single billing services in Commonwealth Edison Company's ("ComEd") service territory, DES sets forth its good faith estimate of the total amount DES expects to be obliged to pay ComEd under ComEd's Rider SBO Single Bill Option during the next twelve months. Attachment I also contains a Letter of Credit for an amount equal to 15% of DES's good faith estimate.

2. DES requests that the dollar amount of the good faith estimate set forth in Attachment I, and the dollar amount specified in the Letter of Credit also set forth in Attachment I, be designated confidential and excluded from the public domain as reflected in Attachment I (Public).

3. The good faith estimate and the associated dollar amount set forth in the Letter of Credit constitute sales and marketing data belonging to DES and are not publicly available. To the extent other retail electric suppliers view this information, the data can be used by competitors of DES and extrapolated to reveal insights into DES's business strategy in terms of the overall anticipated usage and size of DES's ComEd SBO-billed customer base and the amount of retail power DES anticipates selling in ComEd's territory over the next twelve months. A competitor could take advantage of this information to estimate market share among ARES providing SBO service and in planning its own pricing, sales and marketing efforts to the detriment of DES's financial interests as well as to the competitive retail electric market generally.

4. Accordingly, DES views the good faith estimate and related Letter of Credit amount to fall within the "trade secret" exemption of the Illinois Freedom of Information Act, 5 ILCS 140/7(1)(g):

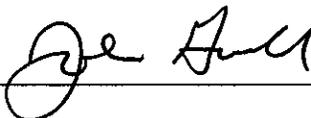
(g) Trade secrets and commercial or financial information obtained from a person or business where the trade secrets or commercial or financial information are furnished under a claim that they are proprietary, privileged or confidential, and that disclosure of the trade secrets or commercial or financial information would cause competitive harm to the person or business, and only insofar as the claim directly applies to the records requested.

WHEREFORE, DES respectfully requests that the dollar amount of the good faith estimate set forth in Attachment I to its ARES Application, and the dollar amount reflected in the Letter of Credit also set forth in Attachment I, be kept under seal and not made part of the public record for a period of not less than two (2) years from the date of the filing of DES's ARES Application.

Dated: April 24, 2014

Respectfully Submitted,

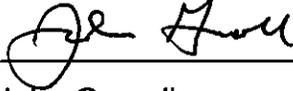
Illinois Power Marketing Company

By:  \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I, John Gomoll, Counsel for Illinois Power Marketing Company, do hereby certify that a copy of the foregoing *Motion for Confidential Treatment* was filed with the Chief Clerk of the Illinois Commerce Commission on April 25, 2014.

  
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John Gomoll

