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ILLINOIS COMMERCE COMMISSION

STATE OF ILLINOIS
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COMMISSION

2014 APR 30 A 10:15

CHIEF CLERK'S OFFICE

Illinois Power Marketing Company :
(d/b/a Homefield Energy) :

Petition for Confidential Treatment :
To Protect Portions of Illinois Power :
Marketing Company's 2014 Report :
Of Continued Compliance as an ARES :
From Disclosure For a Period of Not Less :
Than Two Years In Order To Protect Highly :
Confidential and Proprietary Information. :

Docket No. 14-0353

PETITION FOR CONFIDENTIAL TREATMENT

Illinois Power Marketing Company ("IPM"), pursuant to 83 Ill. Adm. Code § 451.60 and 83 Ill. Adm. Code § 200.430, hereby petitions the Illinois Commerce Commission ("Commission") to protect from disclosure for not less than two years certain portions of certain attachments identified herein to IPM's 2014 Report of Continued Compliance as an ARES filed with the Commission's Chief Clerk pursuant to 83 Illinois Administrative Code § 451.700. In support of its Motion, IPM states as follows:

1. In Attachment D to IPM's 2014 annual compliance filing, 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, IPM sets forth its good faith estimate of the total dollar amount IPM expects to be obliged to pay ComEd under ComEd's Rider SBO Single Bill Option during the next twelve months. Attachment C to IPM's 2014 annual compliance filing contains a Letter of Credit for a dollar amount equal to 15% of IPM's good faith estimate.

2. IPM requests that the dollar amount of the good faith estimate set forth in Attachment D, and the dollar amount specified in the Letter of Credit set forth in Attachment C, be designated confidential and excluded from the public domain as reflected in the public versions of Attachments D and C submitted by IPM to the Chief Clerk as part of its 2014 Report of Continued Compliance as an ARES and also attached hereto.

3. The good faith estimate and the associated dollar amount set forth in the Letter of Credit constitute highly confidential and proprietary sales and marketing data belonging to IPM and are not publicly available. To the extent other retail electric suppliers view this information, the data can be used by competitors of IPM and extrapolated to reveal insights into IPM's business strategy in terms of the overall usage and size of IPM's ComEd SBO-billed customer base and the amount of retail power IPM 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 IPM's financial interests as well as to the competitive retail electric market generally.

4. Accordingly, IPM 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):

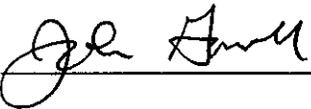
(g) Trade secrets and commercial or financial information obtained from a person or business where the trade secrets or commercial or financial information are furnished under a claim that they are proprietary, privileged or confidential, and that disclosure of the trade secrets or commercial or financial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

WHEREFORE, IPM respectfully requests that the Commission enter an Order, without hearing, protecting from disclosure the dollar amount of the good faith estimate set forth in Attachment D to its 2014 Report of Continued Compliance as an ARES, and the dollar amount reflected in the Letter of Credit set forth in Attachment C to IPM's 2014 Report of Continued Compliance, and that these dollar amounts be kept under seal and not made part of the public record for a period of not less than two (2) years.

Dated: April 29, 2014

Respectfully Submitted,

Illinois Power Marketing Company

By:  _____

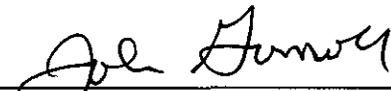
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Illinois Power Marketing Company
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VERIFICATION

STATE OF ILLINOIS)
)
COUNTY OF KANE)

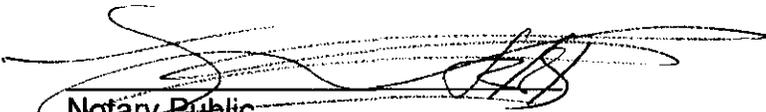
ss:

John Gomoll, being first duly sworn, deposes and says that he serves as Director, Regulatory and Legislative Affairs, for Illinois Power Marketing Company d/b/a Homefield Energy ("IPM"); that he has read IPM's *Petition for Confidential Treatment To Protect Portions of Illinois Power Marketing Company's 2014 Report of Continued Compliance as an ARES From Disclosure For a Period of Not Less Than Two Years In Order To Protect Highly Confidential and Proprietary Information*; and, that the statements contained in the Petition are true, correct and complete to the best of his knowledge, information and belief.



John Gomoll

Subscribed and sworn to before me
this 29 day of April, 2014.



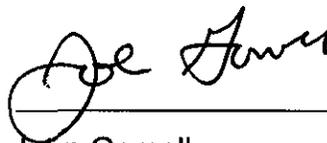
Notary Public

[Stamp of Notary]



CERTIFICATE OF SERVICE

I, John Gomoll, Director, Regulatory and Legislative Affairs for Illinois Power Marketing Company, do hereby certify that a copy of the foregoing *Petition for Confidential Treatment* was filed with the Chief Clerk of the Illinois Commerce Commission on April 30, 2014.

A handwritten signature in black ink, appearing to read "John Gomoll", written over a horizontal line.

John Gomoll