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ILLINOIS COMMERCE COMMISSION

ORIGINAL

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

MP2 Energy IL, LLC	:	Docket No. ~~13-0288~~ 14-0365
	:	
Motion for Confidential Treatment	:	
	:	

MOTION FOR CONFIDENTIAL TREATMENT AND PROTECTIVE ORDER

MP2 Energy IL, LLC. (MP2) hereby petitions the Illinois Commerce Commission ("Commission") for confidential treatment for a period of not less than two (2) years of confidential and proprietary information contained in the ARES Report of Part 451 Continuing Compliance.

In accordance with 83 Ill. Adm. Code Section 451.60 provides: "If an applicant or ARES believes any of the information to be disclosed by an applicant of 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.

Specifically, MP2 requests that the Commission issue an order requiring confidential treatment for:

- Confidential Attachment 1 – Financial Reporting Requirements
- Confidential Attachment 3 – Managerial Reporting Requirements
- Confidential Attachment 4 – Technical Reporting Requirements
- Confidential Attachment 5 – License or Permit Bond

MP2 believes the aforementioned information to be highly proprietary, and if disclosed could lead to competitive harm to MP2. Section 7(g) of the Illinois Freedom of Information Act exempts from public disclosure "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 person or business, and only insofar as the claim applies to the records requested.

It is the belief that the contained documents are competitively sensitive and/or employee specific and will not advance the public's understanding of MP2.

ILLINOIS COMMERCE COMMISSION
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Respectfully submitted,
MP2 Energy IL, LLC

Drew Baird
Vice President

VERIFICATION

STATE OF TEXAS)
COUNTY OF MONTGOMERY)

DREW BAIRD, being first duly sworn, deposes and says that he is the Vice President of MP2 Energy IL, LLC; that he has read the foregoing Motion for Confidential Treatment of MP2 Energy IL, LLC, and all of the attachments accompanying and referred to within the Motion; and that the statements contained in the Motion and the attachments are true, correct and complete to the best of his knowledge, information and belief.

Drew Baird

Subscribed and sworn to before me

this 1 day of May, 2014.

Notary Public

[Stamp of Notary]

AMY LUNGER
MY COMMISSION EXPIRES
MARCH 8, 2017