

**OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION**

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**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Mansfield Power and Gas LLC §
§
Application for Certificate of Service §
Authority under Section 19-110 of the §
Public Utilities Act §
§

Docket No: 1402
October 9, 2014

CHIEF CLERK'S OFFICE

OCT 14 P 2:49

ILLINOIS COMMERCE
COMMISSION

MOTION FOR PROTECTIVE ORDER

NOW COMES Mansfield Power and Gas LLC ("MPG"), by its attorney Sorling Northrup, John R. Simpson, of counsel, and hereby moves to protect from public disclosure until no earlier than October 10, 2019 highly confidential information included in its Application for Certificate of Service Authority to be an Alternative Gas Supplier ("AGS") under Section 19-110 of the Public Utilities Act ("Act") and 83 Ill. Adm. Code 551 ("Part 551"). In support of the instant Motion, MPG states as follows:

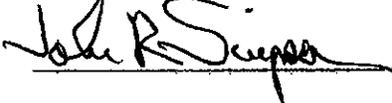
1. In accordance with the application requirements, MPG must submit certain financial information along with its Application.
2. Certain information included in MPG Attachment "K" contains the most recent two years of audited financial information of its parent company, Mansfield Energy Corp. ("MEC") which is confidential information.

3. MPG takes reasonable steps to prevent this information from becoming publicly available, and the disclosure of MEC's financial information would cause competitive harm to the business.
4. 83 Ill Adm. Code Section 551.60 provides that: If an applicant or AGS believes any of the information to be disclosed by an applicant or AGS is privileged or confidential, the applicant or AGS 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.
5. MPG seeks an Order from the Commission, without hearing, protecting from public disclosure until no earlier than October 10, 2019, Attachment "K" to its Application regarding the financial information of its parent company, MEC.
6. Therefore, pursuant to Section 200.430 of the Commission's Rules of Practice, MPG respectfully requests that the Commission enter an Order, without hearing, protecting from public disclosure until no earlier than October 10, 2019, Attachment "K" that was submitted to the Chief Clerk of the Commission on October 9, 2014 as part of MPS' Application.

Dated: October 9, 2014

Respectfully submitted,

SORLING NORTHRUP

By: 

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VERIFICATION

COUNTY OF HALL, STATE OF GEORGIA

I have read the foregoing MOTION FOR PROTECTIVE ORDER and know its contents. I am a duly sworn representative of Mansfield Power and Gas LLC ("MPG"). The matters stated in the foregoing document are based upon the contents of Attachment "K" included in MPG's Application for Certificate of Service Authority to be an Alternative Gas Supplier ("AGS") under Section 19-110 of the Public Utilities Act ("Act") and 83 Ill. Adm. Code 551 ("Part 551"), and I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 9, 2014 in the County of Hall in the State of Georgia.



{name} John Byrd
EVP, Mansfield Power and Gas, LLC

Subscribed and sworn to before me
this 9th day of October, 2014.



Notary Public

