

**Illinois Power Marketing Company** :  
: :  
: :  
**Petition for Confidential Treatment** :  
**To Protect Portions of Illinois Power** :  
**Marketing Company's 2015 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. 15-**

15-0325

CHIEF CLERK'S OFFICE  
2015 APR 30 P 4:00  
ILLINOIS COMMERCE  
COMMISSION

**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 2015 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 2015 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 2015 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 2015 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 2015 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 2015 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, 2015

Respectfully Submitted,

Illinois Power Marketing Company

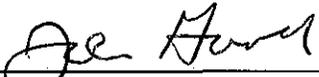
By:  \_\_\_\_\_

John Gomoll  
Director, Regulatory and Legislative Affairs  
Illinois Power Marketing Company  
P.O. Box 211  
Saint Charles, Illinois 60174  
office: (618) 214-7109  
fax: (713) 356-2925  
e-mail: john.gomoll@dynegy.com

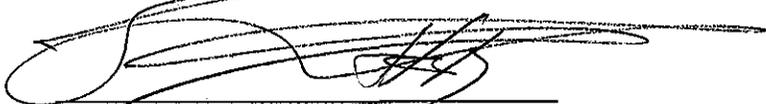
VERIFICATION

STATE OF ILLINOIS                    )  
  )  
COUNTY OF KANE                    )        **ss:**

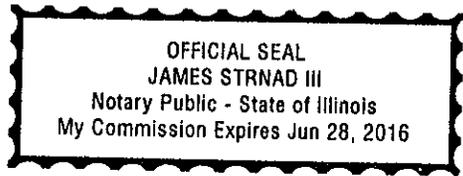
John Gomoll, being first duly sworn, deposes and says that he serves as Director, Regulatory and Legislative Affairs for Illinois Power Marketing Company d/b/a Homefield Energy; that he has read the foregoing *Illinois Power Marketing Company d/b/a Homefield Energy Petition for Confidential Treatment* (Petition) dated April 29, 2015; 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, 2015.

  
\_\_\_\_\_  
Notary Public

[Stamp of Notary]



Public  
Attachment C



THE BANK OF NEW YORK MELLON

OUR REF NO.  
S00303404

CORRESPONDENT'S REF. NO.  
CL00050415

DATE:  
APRIL 29, 2015

BENEFICIARY:  
COMMONWEALTH EDISON COMPANY  
1919 SWIFT DRIVE  
OAKBROOK, IL 60521  
ATTN: VP, ENERGY ACQUISITION

CORRESPONDENT:  
MACQUARIE BANK LIMITED  
LEVEL 6 50 MARTIN PLACE  
SYDNEY 2000 AUSTRALIA

DATE OF ORIGINAL ISSUE:  
APRIL 01, 2015

AMENDMENT DATE:  
APRIL 29, 2015

GENTLEMEN/LADIES:

THE ABOVE MENTIONED INSTRUMENT INCLUDING ANY PREVIOUS AMENDMENTS, IS  
AMENDED AS FOLLOWS:

ADDITIONAL CONDITIONS:  
AMENDMENT NUMBER 1

THE ISSUING BANK STATES:

-QUOTE-

THE MAXIMUM AMOUNT AVAILABLE IS DECREASED TO

[REDACTED] UNITED STATES DOLLARS).

PLEASE OBTAIN BENEFICIARY'S CONSENT TO THIS  
REDUCTION REQUEST.

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

-UNQUOTE-

CREDIT AMOUNT DECREASED BY \*\*USD [REDACTED]  
NEW CREDIT AMOUNT TOTAL \*\*USD [REDACTED]

THIS AMENDMENT IS SUBJECT TO THE BENEFICIARY'S  
CONSENT. PLEASE FAX A COPY OF THIS AMENDMENT  
ALONG WITH YOUR SIGNATURE AS YOUR AGREEMENT TO  
THE ABOVE STATED AMENDMENT.  
PLEASE FAX YOUR AGREEMENT TO:  
THE BANK OF NEW YORK MELLON  
FAX: (732) 667-6383

AGREEMENT TO AMENDMENT  
AUTHORIZED SIGNATURE  
COMMONWEALTH EDISON COMPANY

**Good Faith Estimate Used to Calculate Letter of Credit Amount**

Good faith estimate of the total amount IPM expects to be obligated to pay to Commonwealth Edison (ComEd) under ComEd's Rider SBO Single Bill Option during the next twelve months for contracts entered into by IPM after 12/2/2013: \$ [REDACTED]. Contracts entered into before 12/2/2013 are covered by Ameren Illinois' unconditional guaranty.