

Before the
STATE OF ILLINOIS
COMMERCE COMMISSION

Iron Energy, LLC d/b/a Kona Energy)
d/b/a Zone Energy)
Amended Annual Report)
_____)

Docket No.

15-0445

CHIEF CLERK'S OFFICE
2015 AUG - 3 P 12 57
ILLINOIS COMMERCE
COMMISSION

MOTION FOR CONFIDENTIAL TREATMENT AND PROTECTIVE ORDER

Iron Energy, LLC d/b/a Kona Energy d/b/a Zone Energy ("Iron") License No. 12-0470, hereby respectfully requests that the Illinois Commerce Commission ("Commission") grant its Motion for Confidential Treatment and Protective Order for portions of its Amended Annual Report, filed with the Commission on July 31, 2015. Iron respectfully requests that the Commission treat portions as "Confidential" and that these portions of the Amended Annual Report are not made part of the public record. Specifically, Iron seeks confidential treatment of the following portions of its Application:

- Attachment A, Managerial Qualifications
- Attachment B, Technical Qualifications
- Attachment C, ESCO Advisors Consulting & Services Agreement

In support of its Motion, Iron states as follows:

1. Iron is filing an Amended Annual Report pursuant to Part 451 of the Illinois Administrative Code.
2. The portions of the Report identified above contain highly confidential and proprietary business information. Specifically, portions of Attachments A, B and C contain highly sensitive and confidential information about business relationships of Iron, disclosure of

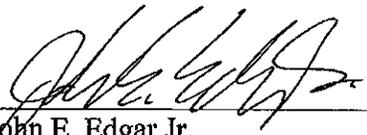
which would seriously harm Iron's ability to operate its business. This information is of a proprietary nature. Iron takes steps to guard the confidentiality of this information and does not disclose it outside of its business unless required to do so by law. Disclosure of this business information would cause an extreme hardship on current and future business operations of Iron.

3. Section 451.60 of the Illinois Administrative Code provides for confidential treatment of such information.
4. Section 200.430 of the Illinois Administrative Code provides for protective orders for the protection of confidential, proprietary or trade secret nature of any data, information, or studies.
5. Iron requests that the Protective Order be in full effect for five years from the date of submission.

WHEREFORE, Iron Energy, LLC d/b/a Kona Energy d/b/a Zone Energy respectfully requests that the Chief Clerk of the Commission treat sections of the Amended Annual Report as Confidential and sealed under protective orders and not made part of the public record of Iron's Amended Annual Report and not posted on the websites of the Illinois Commerce Commission or the Office of the Clerk.

Respectfully Submitted,

IRON ENERGY, LLC d/b/a KONA
ENERGY d/b/a ZONE ENERGY



John E. Edgar Jr.
President

VERIFICATION

STATE OF Texas)

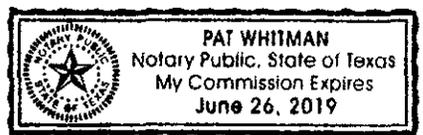
COUNTY OF Travis)

I, John E. Edgar Jr., being first duly sworn, deposes and says that he is the President of IRON ENERGY LLC d/b/a KONA ENERGY d/b/a ZONE ENERGY; that he has read the foregoing Motion for Protective Order to Protect Confidential and Proprietary Information of IRON ENERGY LLC d/b/a KONA ENERGY d/b/a ZONE ENERGY, and all of the attachments accompanying and referred to within the Motion for Protective Order; and that the statements and information contained in the Motion for Protective Order are true, correct and complete to the best of his knowledge, information and belief. IRON ENERGY LLC d/b/a KONA ENERGY d/b/a ZONE ENERGY, will remain in continuing compliance with all requirements of the Illinois Public Utilities Act and 83 IL Adm. Code 451.

[Handwritten Signature]
Signature
John E. Edgar, Jr.
Name
President
Position Held
512.329.1936
Contact Phone #

Subscribed and sworn before me
This 27 day of July 2015.

[Handwritten Signature]
Notary Public



[Stamp of Notary]