

**OFFICIAL FILE  
ILLINOIS COMMERCE COMMISSION**

STATE OF ILLINOIS

**ORIGINAL**

ILLINOIS COMMERCE COMMISSION

**Ambit Northeast, LLC.**  
Motion for Protective Order  
in Order to Protect  
Highly Proprietary Information

)  
) 16-0323  
)

**RECEIVED**  
MAY 18 2016

ILLINOIS COMMERCE COMMISSION  
CHIEF CLERK'S OFFICE

**PETITION**

NOW COMES, **Ambit Northeast, LLC** ("Petitioner") and hereby petitions the Illinois Commerce Commission ("Commission") for a motion to protect Petitioner's 2015/2016 ARES Part 451 and 2015 Financial Statements from disclosure in order to protect highly proprietary information included therein. In support of this Petition, Petitioner states as follows:

1. The data in ARES Part 451 of the Petitioner contains highly proprietary and confidential commercial and financial information, the disclosure of which to competitors, or potential competitors, would be detrimental to Petitioner.
  
2. The Financial Statements of the Petitioner contains highly proprietary and confidential commercial and financial information, the disclosure of which to competitors, or potential competitors, would be detrimental to Petitioner.
  
3. Petitioner seeks an Order from this Commission, without hearing, protecting from disclosure in its entirety Petitioner's Financial Statements.

WHEREFORE, **Ambit Northeast, LLC** respectfully requests that the Commission enter an Order, without hearing, protecting from disclosure in its entirety the ARES Part 451 and Financial Statements of the Petitioner.

DATED this 17<sup>th</sup> day of May, 2016.

Respectfully submitted,

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

