

**OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION**

**Before the
STATE OF ILLINOIS
COMMERCE COMMISSION**

ORIGINAL
Public

RPA Energy Inc.)
)
Application to become an Alternative)
Electric Retail Supplier)
_____)

Docket No.
16-0364

RECEIVED

JUN 29 2016

ILLINOIS COMMERCE COMMISSION
CHIEF CLERK'S OFFICE

MOTION FOR CONFIDENTIAL TREATMENT AND PROTECTIVE ORDER

RPA Energy Inc. (“RPA Energy”), hereby respectfully requests that the Illinois Commerce Commission (“Commission”) grant its Motion for Confidential Treatment and Protective Order for portions of its Application for Certificate of Service Authority (“ARES Application”) to become an Alternative Electric Retail Supplier, filed with the Commission on **June __, 2016**. RPA Energy respectfully requests that the Commission treat portions as “Confidential” and that these portions of the ARES Application are not made part of the public record. Specifically, RPA Energy seeks confidential treatment of the following portions of its Application:

- **Attachment 8a_Illinois License**
- **Attachment 20_Financial Qualifications**
- **Attachment 21_Financial Qualifications**
- **Attachment 24_Manual Qualifications**

In support of its Motion, RPA Energy states as follows:

1. RPA Energy is filing an Initial Application to become an Alternative Retail Electric Supplier 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, **Attachments 8a, 20, 21, and 24** contain financial and proprietary information which is not available to the public and which would harm RPA Energy's business interests if make publicly available. **Portions of Attachment 8a** contain proprietary information about the company's stock and organizational structure. **Attachments 20 and 21** contains information on the bond and other financial qualifications submitted to the Commission, and is not made public. **Portions of Attachments 24** contain personal and confidential information about the corporate structure and business relationships of RPA Energy, disclosure of which would seriously harm RPA Energy's ability to operate its business. This information is of a proprietary nature. RPA Energy 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 RPA Energy.
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. RPA Energy requests that the Protective Order be in full effect for five years from the date of submission.

WHEREFORE, RPA Energy Inc. respectfully requests that the Chief Clerk of the Commission treat sections of the Annual Report as Confidential and sealed under protective orders and not made part of the public record of RPA Energy's Annual Report and not posted on the websites of the Illinois Commerce Commission or the Office of the Clerk.

Respectfully Submitted,

RPA Energy Inc.



Name: Brian Trumbino
Title: President

VERIFICATION

STATE OF New York)

COUNTY OF New York)

I, Brian Trombino, being first duly sworn, deposes and says that he/she is the President of RPA ENERGY INC.; that he/she has read the foregoing Motion for Protective Order to Protect Confidential and Proprietary Information of RPA ENERGY INC., 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/her knowledge, information and belief. RPA ENERGY INC. will remain in continuing compliance with all requirements of the Illinois Public Utilities Act and 83 IL Adm. Code 451.

[Signature]
Signature
Brian Trombino
Name
President
Position Held
516-858-3352
Contact Phone #

Subscribed and sworn before me

This 8th day of June 2016.

[Signature]
Notary Public

[Stamp of Notary]

CHESTER HAWKINS
Notary Public - State of New York
No. 01HA6266630
Qualified in Kings County
My Commission Expires 8/8/2016