

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION
Before the
STATE OF ILLINOIS
COMMERCE COMMISSION

ORIGINAL

RECEIVED

JUN 29 2016

RPA Energy Inc.)
)
Application to become an Alternative)
Natural Gas Supplier)
_____)

Docket No.

16-0365

ILLINOIS COMMERCE COMMISSION
CHIEF CLERK'S OFFICE

MOTION FOR CONFIDENTIAL TREATMENT AND PROTECTIVE ORDER

RPA Energy Inc. ("RPA Energy") License No. 11-0743, 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 to become a Natural Gas Supplier, filed with the Commission on _____, 2016. RPA Energy respectfully requests that the Commission treat portions as "Confidential" and that these portions of the Annual Report are not made part of the public record. Specifically, RPA Energy seeks confidential treatment of the following portions of its Application:

- **Attachment 7, Illinois License**
- **Attachment 21, Dispute Resolution**
- **Attachment 30, Financial Qualifications**
- **Attachment 32, Managerial Qualifications**

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

1. RPA Energy is filing an 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, **Attachments 7, 21, 30, and 32** 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 7** contain proprietary information about the company's stock and organizational structure. **Attachment 21**, which is a sample disclosure statement, is not typically made public for reasons of business competition. **Attachment 30**, which details RPA Energy's financials and financial arrangements, is kept as confidential by RPA Energy and its affiliates and is not made public. Portions of **Attachment 32** contain highly sensitive 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 Trombino
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 2018.

[Signature]
Notary Public

[Stamp of Notary]

CHESTER HAWKINS
Notary Public - State of New York
No. 01HA6266630
Qualified in Kings County
My Commission Expires 8/6/2018