

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

ORIGINAL

Before the
STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

RECEIVED
SEP 20 2016

Freepoint Energy Solutions LLC)
)
Application to become an Alternative)
Electric Retail Supplier)
_____)

ILLINOIS COMMERCE COMMISSION
CHIEF CLERK'S OFFICE
Docket No. 16-0443

MOTION FOR CONFIDENTIAL TREATMENT AND PROTECTIVE ORDER

Freepoint Energy Solutions LLC (“Freepoint 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 **September 19, 2016**. Freepoint 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, Freepoint Energy seeks confidential treatment of the following portions of its Application:

- **Attachment A-Jurisdiction List and Complaint Disclosure**

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

1. Freepoint 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, **the redacted portion of Attachment A** contains personal and confidential information about the business relationships and internal

governance procedures of Freepoint Energy, disclosure of which would seriously harm Freepoint Energy's ability to operate its business. Freepoint 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 Freepoint 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. Freepoint Energy requests that the Protective Order be in full effect for two years from the date of submission.

WHEREFORE, Freepoint Energy Solutions LLC respectfully requests that the Chief Clerk of the Commission treat sections of the ARES Application as Confidential and sealed under protective orders and not made part of the public record of Freepoint Energy's ARES Application and not posted on the websites of the Illinois Commerce Commission or the Office of the Clerk.

Respectfully Submitted,

Freepoint Energy Solutions LLC


Name: **Wendy Lewis**
Title: **Authorized Signatory**

VERIFICATION

STATE OF Connecticut

COUNTY OF Fairfield

I, Wendy Lewis, being first duly sworn, deposes and says that she is an Authorized Signatory of FREEPOINT ENERGY SOLUTIONS LLC; that she has read the foregoing Motion for Protective Order to Protect Confidential and Proprietary Information of FREEPOINT ENERGY SOLUTIONS LLC, 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 her knowledge, information and belief. FREEPOINT ENERGY SOLUTIONS LLC will remain in continuing compliance with all requirements of the Illinois Public Utilities Act and 83 IL Adm. Code 451.

Wendy Lewis
Signature

Wendy Lewis
Name

Authorized Signatory
Position Held

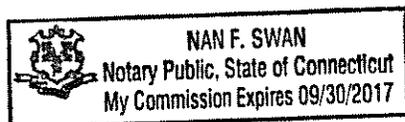
203-542-6753
Contact Phone #

Subscribed and sworn before me

This 7 day of September 2016.

Nan Swan
Notary Public

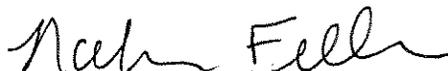
[Stamp of Notary]



CERTIFICATE OF SERVICE

STATE OF New York
COUNTY OF Kings

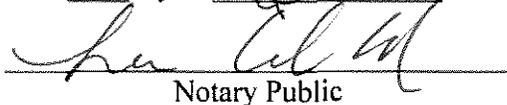
I, Natara G. Feller, an attorney, certify that on September , 2016, I served the foregoing Freepoint Energy Solutions LLC Request for Certificate of Service Authority to Operate as an Alternative Electric Retail Supplier to the Commission and the Gas Engineering, Safety and Reliability Division, the Finance Department, the Financial Analysis Division, Office of Retail Marketing Development, and the Bureau of Administrative Law Judges.



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Managing Attorney
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Brooklyn, NY 11232
natarafeller@feller.law
Counsel for Freepoint Energy Solutions LLC

Subscribed and sworn before me

This day of September 2016.



Notary Public

[Stamp of Notary]

LENA E. GOLZE DESMOND
Notary Public, State of New York
Reg. No. 02G06334059
Qualified in New York County
Commission Expires 12/07/2019