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January 8, 2018

JAN - 9 2018

VIA FEDEX

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**RE: XOOM Energy Pennsylvania, LLC Quarterly Gross Receipts Report
Electric Supplier #A - 2012-2283821**

Dear Ms. Chiavetta:

XOOM Energy Pennsylvania, LLC ("XOOM Energy") is hereby submitting its Quarterly Report for the period October 2017 to December 2017. This Quarterly Report contains XOOM Energy's electric generation sales and supply information which constitute proprietary financial information that should be protected from public disclosure. As such, enclosed please find a Motion for Protective Order, clean and redacted versions of XOOM Energy's Quarterly Report.

Please feel free to contact me at kdetombeur@xoomenergy.com or call me at 704-274-3375 with questions. Thank you in advance.

Respectfully,

Kyle De Tombeur
Regulatory Specialist
XOOM Energy, LLC, single member manager
of XOOM Energy Pennsylvania, LLC

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

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In the Matter of Application of XOOM Energy Pennsylvania, LLC)
For Certificate Of Service Authority Pursuant to Section 19-110)
And Section 16-115 of the Public Utilities Act)

JAN - 9 2018

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

**PETITION FOR PROTECTIVE ORDER TO PROTECT
CONFIDENTIAL PROPRIETARY INFORMATION**

I. INTRODUCTION

XOOM Energy Pennsylvania, LLC ("XOOM Energy Pennsylvania") respectfully requests that the Pennsylvania Public Utility Commission (the "Commission") grant exemption from public disclosure, confidential proprietary information related to the business activities of XOOM Energy Pennsylvania. This confidential and proprietary information, which includes electric generation sales and supply (kWh), financial information, and are being provided as a required part of XOOM Energy Pennsylvania's Quarterly Gross Receipts Report ("Quarterly Report") pursuant to 52 Pa Code § 54.39(d).

This protective order is requested to be in place indefinitely or as the Commission sees fit for a period of no less than five (5) years to protect the confidential and proprietary information of XOOM Energy Pennsylvania, a privately held company incorporated in the State of Pennsylvania. Pursuant to 52 Pa Code § 54.39(b)(2) and §5.423 of Section 052 of the Pennsylvania Code, XOOM Energy respectfully submits this motion for protective order in its assertion of a confidentiality claim.

**II. THE MATERIALS ARE PROPRIETARY AND CONFIDENTIAL AND WARRANT
PROTECTION FROM DISCLOSURE**

XOOM Energy Pennsylvania's electric generation sales (kWh) and supply information, financial information, and supply agreement under which XOOM Energy Pennsylvania conducts its business constitute proprietary confidential information that should be protected from public disclosure. XOOM Energy Pennsylvania is a privately held company that seeks to provide competitive energy services in the state of

Pennsylvania, and these confidential and proprietary documents which provide detail information not only about the financial state of a privately held company but also detailed information about the business plans and supply arrangement of the company are important to allowing XOOM Energy Pennsylvania to provide a cost-effective service that will be competitive in the retail energy market in the state of Pennsylvania. The disclosure of this information to the public would give undue advantage to competitors of XOOM Energy Pennsylvania and discourage private companies from seeking to be competitive suppliers in the Commonwealth; conversely, the protection of this information will help safeguard the competitiveness of the retail energy market. This kind of competitively sensitive information is routinely protected from public disclosure and this information should be protected here.

There would be no harm to the public if information subject to this motion for protective order is protected. In fact, protecting this information will be beneficial to the future customers of XOOM Energy Pennsylvania, who will benefit from XOOM Energy Pennsylvania's ability to obtain positive position in the competitive energy market.

To the best of the moving party's knowledge, information, and belief, the information subject to this motion for protective order is not available in the public domain.

III. LEGAL STANDARD

The Pennsylvania Public Utility Commission may exempt confidential information from public disclosure through the issuance of a protective order to limit the availability of proprietary information in accordance with 52 Pa. Code § 54.39(b)(2) and 052 Pa. Code §5.423. In determining if a petition for protective order should be granted the statute states the following should be considered, among other things:

- (1) The extent to which the disclosure would cause unfair economic or competitive damage.
- (2) The extent to which the information is known by others and used in similar activities, and
- (3) The worth or value of the information to the party and to the party's competitors.

As set out above the disclosure of the financial information and supply agreement which set out how XOOM Energy Pennsylvania will operate its business would cause an unfair economic disadvantage to XOOM Energy Pennsylvania in its efforts to become a competitive supplier of electricity in the Commonwealth of Pennsylvania. Moreover, it is the belief of XOOM Energy Pennsylvania that the disclosure of such information may have a chilling effect on other private companies seeking to become competitive suppliers in the Commonwealth to the detriment of its citizens. The information requested to be protected under this petition is not known by others outside of the company.

XOOM Energy Pennsylvania believes in good faith that its private financial information and supply agreement constitute "confidential/proprietary information" that should be limited in availability as provided for under 52 Pa Code §54.39(b)(2) and 052 Pa. Code §5.423.

XOOM Energy Pennsylvania respectfully requests that the Commission exercise its discretion and provide protection and confidential treatment of XOOM Energy Pennsylvania's information submitted in support of this motion.

IV. CONCLUSION

For the reasons set forth above, XOOM Energy Pennsylvania requests that the Commission protect from public disclosure the confidential and proprietary information included in its Quarterly Report.

Respectfully Submitted,



Stephanie C. Kueffner
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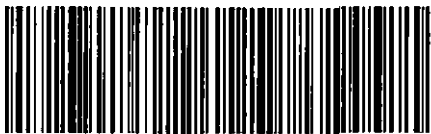


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