

**STATE OF INDIANA
INDIANA UTILITY REGULATORY COMMISSION**

**VERIFIED PETITION OF SOUTHERN)
INDIANA GAS AND ELECTRIC COMPANY)
D/B/A VECTREN ENERGY DELIVERY OF)
INDIANA, INC. ("VECTREN SOUTH") FOR:)
(1) APPROVAL OF A MISO COST AND)
REVENUE ADJUSTMENT FOR ELECTRIC)
SERVICE IN ACCORDANCE WITH THE)
ORDER OF THE COMMISSION IN CAUSE)
NO. 43111 EFFECTIVE AUGUST 15, 2007)
AND CAUSE NO. 43839 DATED APRIL 27,)
2011 PURSUANT TO I.C. § 8-1-2-42(a); AND)
(2) AUTHORITY TO FILE FOR MISO COST)
REVENUE ADJUSTMENTS ON AN ANNUAL)
BASIS AS OPPOSED TO SEMI-ANNUALLY)**

CAUSE NO. 43354 – MCRA21

**SABIC INNOVATIVE PLASTICS MT. VERNON. LLC'S
MOTION FOR CONFIDENTIAL TREATMENT**

Intervenor, SABIC Innovative Plastics Mt. Vernon, LLC ("SABIC"), by counsel, pursuant to 170 IAC 1-1.1-4, Indiana Code § 5-14-3 and Indiana Code § 8-1-2-29, requests the Indiana Utility Regulatory Commission ("Commission") enter an Order prohibiting dissemination outside of the Commission and adopting safeguards for the handling of confidential information to be submitted by SABIC. In support of this motion, SABIC states:

1. Certain attachments and workpapers of SABIC witness Laurie Tomczyk contain SABIC's specific load and energy usage information, information on contracted interruptible service, demand and energy usage data, and schematics of SABIC's electric infrastructure (the "Confidential Information").

2. The Confidential Information (i) is such that it may derive actual and potential economic value from being neither generally known to, nor readily ascertainable by proper means by, other persons who could obtain economic value from its disclosure or use; and (ii) is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

3. The Confidential Information is competitively sensitive and a trade secret because competitors may use the information to gain a competitive advantage over SABIC. Additionally, to the extent the Confidential Information includes schematic information about the Company's electric infrastructure, disclosure could pose a security threat to the Company.

4. The Confidential Information is not publicly available from any other source. SABIC takes reasonable precautions to maintain and protect the confidentiality of such information. SABIC does not publicly provide, file, or disclose the Confidential Information and neither SABIC's competitors or customers have access to the Confidential Information.

5. Pursuant to 170 IAC 1-1.1-4, attached hereto as "Exhibit A" is the Affidavit of Christopher Law in Support of this Motion for Confidential Treatment.

WHEREFORE, SABIC respectfully requests the Commission enter an order prohibiting dissemination of the Confidential Information outside of the Commission and adopting safeguards for the handling the Confidential Information contained in Ms. Tomczyk's pre-filed testimony and attachments identified above.

Respectfully submitted,

/s/ Nikki G. Shoultz

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Confidential Treatment has been served upon the following counsel of record electronically or via regular mail this 6th day of

December, 2017:

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/s/ Nikki G. Shoultz

Nikki G. Shoultz, #16509-41

AFFIDAVIT OF CHRISTOPHER LAW

Christopher Law upon his oath, deposes and states:

1. I am Director of Energy & Utilities for SABIC Innovative Plastics (the “Company”).
2. I have personal knowledge of the confidential, proprietary, competitively sensitive, and trade secret nature of the information addressed herein through direct contact with this information and through my investigation with other Company employees who work directly with the confidential information. I have personal knowledge of efforts taken by the Company to maintain the secrecy of the confidential information through direct contact with these efforts and through my investigation of these efforts with other employees who work directly with these procedures.
3. The information for which the Company requests confidential treatment in this proceeding includes the Company's specific load and energy usage information, information on contracted interruptible service, demand and energy usage data, and schematics of SABIC's electric infrastructure (the “Confidential Information”).
4. The Confidential Information is not readily available in the public domain. The Company takes steps to protect this information from public disclosure. Such information is competitively sensitive and a trade secret because competitors may use the information to gain a competitive advantage over the Company. Competitors could use the Confidential Information to adjust and target business strategies to the detriment of the Company. The Confidential Information, if known to SABIC customers, could be used to SABIC's competitive disadvantage. Additionally, to the extent the Confidential Information includes schematic information about the Company's electric infrastructure, disclosure could pose a security threat to the Company. The


Confidential information is not revealed to competitors or other third parties without a binding Nondisclosure Agreement and only in the case of absolute business necessity.

5. The Confidential Information is not available or ascertainable by other parties through normal or proper means. No reasonable amount of independent research could yield this information to other parties.

6. The Confidential Information has been the subject of efforts that are reasonable under the circumstances to maintain its secrecy. The Company restricts the access of information to only those employees, officers, and representatives who have a need to know about such information due to their job and management responsibilities. Access to the Confidential Information has been and will continue to be disclosed only to those employees, officers, and representatives of the Company who have a need to know about such information due to their job and management responsibilities. Outside of the Company, this information is only provided to certain persons who have a legitimate need to review the information.

Further the Affiant sayeth not.

Dated: 12/6/2017



Christopher Law
Manager - Energy & Utilities
SABIC Innovative Plastics