**BEFORE**

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| In the Matter of the Application of **The East Ohio Gas Company d/b/a Dominion East Ohio** for Approval of a General Exemption of Certain Natural gas Commodity Sales Services or Ancillary Services from Chapters 4905, 4909, and 4935 Except Sections 4905.10, 4935.01, and 4935.03, and from Specified Sections of Chapter 4933 of the Revised Code.  In the Matter of the Application to Modify, in Accordance with Section 4928.08, Revised Code, the Exemption Granted to **The East Ohio Gas Company d/b/a Dominion East Ohio** in Case No. 07-224-GA-EXM.  In the Matter of the Application to Modify, in Accordance with Section 4928.08, Revised Code, the Exemption Granted to **The East Ohio Gas Company d/b/a Dominion East Ohio** in Case No. 07-1224-GA-EXM. | :  :  :  :  : :  :  :  :  :  :  :  :  :  :  :  :  : | Case No. **07-1224-GA-EXM**  **Case No. 11-6076-GA-EXM**  **Case No. 12-1842-GA-EXM** |

**MOTION FOR A PROTECTIVE ORDER**

SUBMITTED ON BEHALF OF THE STAFF OF

THE PUBLIC UTILITIES COMMISSION OF OHIO

The Staff of the Public Utilities Commission of Ohio (Staff) hereby requests that the names of the participating bidders in the recent auction for natural gas supplies be kept confidential for fifteen days pursuant to O.A.C. 4901-1-24. The accompanying memo­randum in support sets forth the grounds for this motion.

Respectfully submitted,

**Michael DeWine**

Ohio Attorney General

**William L. Wright**

Section Chief

/s/ Stephen A. Reilly

**Stephen A. Reilly**

Assistant Attorney General

Public Utilities Section

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**MEMORANDUM IN SUPPORT**

On February 19, 2013, an auction was held to procure natural gas supplies for Standard Service Offer (SSO) and Standard Choice Offer (SCO) customers of East Ohio Gas company d/b/a/ Dominion East Ohio (Dominion). On the same date, the Staff filed a report con­cerning the results of the auction. In this report, Staff does not disclose the names of the participating and wining bidders.

Staff requests that the names of the participating and winning bidders be kept confi­dential for a period of fifteen days. This is necessary in order to protect the bidders’ positions in negotiations with pipelines for the incremental capacity necessary to meet their obligations to deliver gas if chosen as a supplier. This information warrants pro­tec­tion as a trade secret because immediate release of this information would cause seri­ous economic harm to the auction participants. Therefore, the Commission should grant a protective order keeping this information under seal for a period of fifteen days.

Respectfully submitted,

**Michael DeWine**

Ohio Attorney General

**William L. Wright**

Section Chief

/s/ Stephen A. Reilly

**Stephen A. Reilly**

Assistant Attorney General

Public Utilities Section

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# PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for a Protective Order** submitted on behalf of the Staff of the Public Utilities Commis­sion of Ohio,was served by regular U.S. mail, postage pre­paid, or hand-delivered, upon the following Parties of Record, this 19th day of February, 2013.

/s/ Stephen A. Reilly

**Stephen A. Reilly**

Assistant Attorney General

**Parties of Record:**

|  |  |
| --- | --- |
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