

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of
Interstate Gas Supply, Inc. for
Certification as a Retail Natural Gas
Supplier)

Case No. 02-1683-GA-CRS

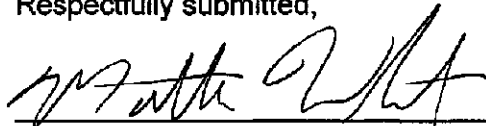
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**MOTION FOR PROTECTIVE ORDER OF INTERSTATE GAS SUPPLY, INC. AND REQUEST
FOR EXPEDITED TREATMENT**

Pursuant to Ohio Administrative Code ("O.A.C.") 4901-1-24, Interstate Gas Supply, Inc. ("IGS") respectfully requests that the Commission issue a Protective Order in the above captioned proceeding, ordering that discovery may not be had by the Northeast Ohio Public Energy Council ("NOPEC") until a determination is made on NOPEC's outstanding motions. In accordance with O.A.C. 4901-1-24(B) a copy of the discovery requests served upon IGS by NOPEC is attached to this motion. Also, an affidavit signed by IGS' counsel is attached setting forth the efforts IGS has made to resolve its differences with NOPEC in regards to NOPEC's discovery requests.

In accordance with O.A.C. 4901-1-12(C) IGS also requests expedited treatment of this Motion. The reasons for this Motion are more fully set forth in the accompanying Memorandum in Support.

Respectfully submitted,



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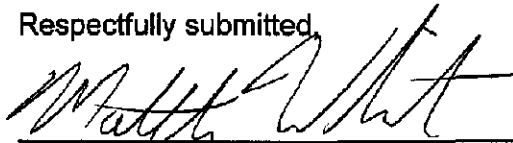
Case No. 02-1683-GA-CRS

**MEMORANDUM IN SUPPORT OF INTERSTATE GAS SUPPLY INC.'S MOTION FOR
PROTECTIVE ORDER AND REQUEST FOR EXPEDITED TREATMENT**

On August 31, 2010 NOPEC filed a Motion to Intervene and Request for Evidentiary Hearing in the above referenced proceeding. On September 3, 2010 NOPEC served a set of discovery requests on IGS. On the same day NOPEC served its discovery requests, IGS filed a Motion for Protective Order requesting that the Commission order that discovery may not be had by the Office of Ohio Consumers' Counsel ("OCC") until a determination is made on OCC's outstanding Motion to Intervene and Motion for Evidentiary Hearing ("September 3rd Motion for Protective Order"). IGS opposes NOPEC's discovery requests for the same reasons as it opposes OCC's discovery requests, and accordingly IGS incorporates by reference the September 3rd Motion for Protective Order into this Memorandum in Support.

This Motion only addresses IGS' Protective Order request. IGS reserves the right to object to the substance of NOPEC's discovery requests if it is determined that NOPEC is entitled to discovery in this proceeding.

Respectfully submitted,



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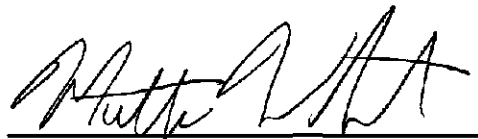
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AFFIDAVIT OF COUNSEL PURSUANT TO OAC 4901-1-24

This statement of Counsel is to certify the efforts to resolve IGS' dispute with NOPEC over NOPEC's Discovery Requests.

1. On September 7, 2010 IGS and NOPEC's counsel spoke on the phone to discuss the possibility of delaying discovery until the Commission has made a determination on OCC's Motions. NOPEC's counsel indicated that NOPEC is not willing to delay discovery.

A handwritten signature in black ink, appearing to read 'Matthew S. White', written over a horizontal line.

Matthew S. White, Esq.

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Motion for Protective Order of Interstate Gas Supply, Inc. and Request for Expedited Treatment* was served upon the following persons listed below by electronic mail and regular U.S. Mail, postage prepaid, this 9th day of September, 2010.

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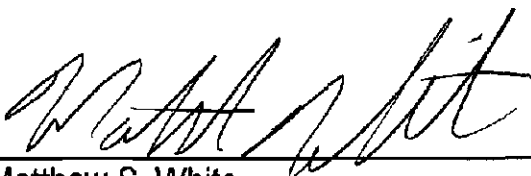
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