

**FILE**

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Fuel Adjustment Clauses )  
for Columbus Southern Power Company and )  
Ohio Power Company. )

Case No. 09-872-EL-FAC  
Case No. 09-873-EL-FAC

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**MOTION FOR PROTECTIVE ORDER  
AND MEMORANDUM IN SUPPORT OF  
INDUSTRIAL ENERGY USERS-OHIO**

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October 15, 2010

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| for Columbus Southern Power Company and )      | Case No. 09-873-EL-FAC |
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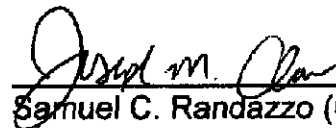
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**MOTION FOR PROTECTIVE ORDER**

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Industrial Energy Users-Ohio ("IEU-Ohio") hereby respectfully moves the Public Utilities Commission of Ohio ("Commission"), pursuant to Rule 4901:1-24(D), Ohio Administrative Code ("O.A.C."), for a protective order regarding confidential information in the "Reply Brief of Industrial Energy Users-Ohio" ("Reply Brief"). Specifically, the confidential information contained in IEU-Ohio's Reply Brief discusses the same confidential information in the management/performance audit report that was previously granted protective treatment as a trade secret by a June 29, 2010 Attorney Examiner Entry (hereinafter "June 29 Entry") in this docket. Pursuant to Rule 4901:1-24(D), O.A.C., IEU-Ohio filed a redacted/public version of its Reply Brief and the confidential version of the Reply Brief is being filed under seal accompanied by this Motion for Protective Order.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Joseph M. Clark", is written over a horizontal line.

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| Ohio Power Company. )                          |                        |

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**MEMORANDUM IN SUPPORT**

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As explained in the Motion for Protective Order, the June 29 Entry granted a Columbus Southern Power Company ("CSP") and Ohio Power Company ("OP") (collectively, American Electric Power-Ohio or "AEP-Ohio") Motion for Protective Order of certain confidential information in the management/performance audit report filed in this docket on May 14, 2010. Additionally, when Parties filed their respective testimony in this case on August 16, 2010, the Attorney Examiner permitted Parties to simply file a letter requesting protective treatment of confidential information in the testimony in lieu of the ordinary motion for protective order inasmuch as the confidential information in the testimony had already been granted protective treatment by the June 29 Entry. IEU-Ohio also filed its Initial Brief in this proceeding under seal, consistent with the June 29 Entry and IEU-Ohio's protective agreement with AEP-Ohio. Consistent with the protective agreement executed by IEU-Ohio and AEP-Ohio as well as the June 29 Entry, IEU-Ohio hereby submits the information contained in its Reply Brief contains the same confidential information already deemed confidential by the June 29 Entry and therefore should continue to be protected as confidential trade secrets in accordance with the June 29 Entry.

Respectfully submitted,



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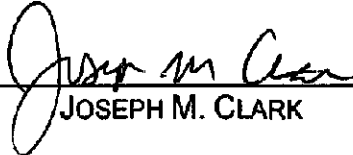
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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Protective Order and Memorandum in Support of Industrial Energy Users-Ohio* was served upon the following parties of record this 15th day of October 2010, via electronic transmission, hand-delivery, or U.S. first class mail, postage prepaid.

  
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**ON BEHALF OF THE STAFF OF THE PUBLIC  
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