

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Columbus Southern Power Company for)	
Approval of its Electric Security Plan; an)	Case No. 08-917-EL-SSO
Amendment to its Corporate Separation)	
Plan, and the Sale or Transfer of Certain)	
Generating Assets.)	

In the Matter of the Application of Ohio)	
Power Company for Approval of its)	
Electric Security Plan; and an)	Case No. 08-918-EL-SSO
Amendment to its Corporate Separation)	
Plan.)	

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

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June 30, 2011

Attorneys for Industrial Energy Users-Ohio

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**BEFORE
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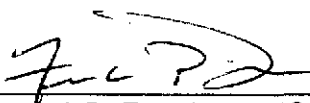
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**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR PROTECTIVE ORDER**

Pursuant to the provisions of Rule 4901-1-24(D), Ohio Administrative Code ("O.A.C."), the Industrial Energy Users-Ohio ("IEU-Ohio") respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a protective order for the confidentiality of Exhibit KMM-3 contained in the direct testimony of Kevin M. Murray filed on behalf of IEU-Ohio on June 30, 2011 in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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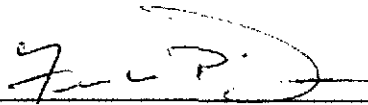
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MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, IEU-Ohio has filed the direct testimony of Kevin M. Murray. By this Motion, IEU-Ohio requests confidential treatment for Exhibit KMM-3 in the direct testimony of Kevin M. Murray which includes a response from Ohio Power Company ("OPCO") and Columbus Southern Power Company ("CSP") (collectively "the Companies") to an interrogatory in this proceeding. OPCO and CSP have designated the response as confidential and competitively sensitive and produced the response subject to a protective agreement between OPCO, CSP and IEU-Ohio. IEU-Ohio takes no position as to whether the information is a confidential trade secret under Ohio law, but files this Motion for Protective Order and Memorandum in Support pursuant to a protective agreement executed by IEU-Ohio and the Companies.

WHEREFORE, IEU-Ohio respectfully requests that this Motion for Protective Order be granted for the reasons set forth herein.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion of Industrial Energy Users-Ohio for Protective Order and Memorandum in Support* was served upon the following parties of record this 30th day of June 2011, via electronic transmission, hand-delivery or first class mail, postage prepaid.


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EXHIBIT KMM-3

FILED UNDER SEAL