

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO 2011 OCT 17 AM 9:13

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In the Matter of the Application of)
 Ohio Power Company and Columbus)
 Southern Power Company for Authority)
 to Merge and Related Approvals.)

Case No. 10-2376-EL-UNC

In the Matter of the Application of)
 Columbus Southern Power Company and)
 Ohio Power Company for Authority to)
 Establish a Standard Service Offer)
 Pursuant to §4928.143, Ohio Rev. Code,)
 in the Form of an Electric Security Plan.)

Case No. 11-346-EL-SSO

Case No. 11-348-EL-SSO

In the Matter of the Application of)
 Columbus Southern Power Company and)
 Ohio Power Company for Approval of)
 Certain Accounting Authority.)

Case No. 11-349-EL-AAM

Case No. 11-350-EL-AAM

In the Matter of the Application of)
 Columbus Southern Power Company to)
 Amend its Emergency Curtailment)
 Service Riders.)

Case No. 10-343-EL-ATA

In the Matter of the Application of)
 Ohio Power Company to Amend its)
 Emergency Curtailment Service Riders.)

Case No. 10-344-EL-ATA

In the Matter of the Commission Review)
 Of the Capacity Charges of Ohio Power)
 Company and Columbus Southern)
 Power Company.)

Case No. 10-2929-EL-UNC

In the Matter of the Application of)
 Columbus Southern Power Company)
 for Approval of a Mechanism to Recover)
 Deferred Fuel Costs Ordered Under)
 Ohio Revised Code 4928.144.)

Case No. 11-4920-EL-RDR

In the Matter of the Application of)
 Ohio Power Company for Approval of a)
 Mechanism to Recover Deferred Fuel)
 Costs Ordered Under Ohio Revised)
 Code 4928.144.)

Case No. 11-4921-EL-RDR

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

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October 17, 2011

Attorney for Industrial Energy Users-Ohio

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
Ohio Power Company and Columbus)	Case No. 10-2376-EL-UNC
Southern Power Company for Authority)	
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In the Matter of the Application of)	
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Establish a Standard Service Offer)	Case No. 11-348-EL-SSO
Pursuant to §4928.143, Ohio Rev. Code,)	
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In the Matter of the Application of)	
Columbus Southern Power Company and)	Case No. 11-349-EL-AAM
Ohio Power Company for Approval of)	Case No. 11-350-EL-AAM
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Amend its Emergency Curtailment)	
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In the Matter of the Application of)	
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In the Matter of the Commission Review)	
Of the Capacity Charges of Ohio Power)	Case No. 10-2929-EL-UNC
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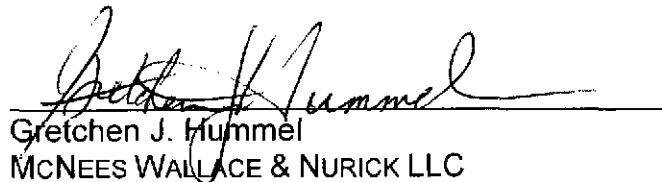
In the Matter of the Application of)	
Columbus Southern Power Company)	Case No. 11-4920-EL-RDR
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In the Matter of the Application of)	
Ohio Power Company for Approval of a)	
Mechanism to Recover Deferred Fuel)	Case No. 11-4921-EL-RDR
Costs Ordered Under Ohio Revised)	
Code 4928.144.)	

**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 the Motion¹ filed in these proceedings by IEU-Ohio on October 17, 2011 for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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¹ The exact title of this motion is not shown in this filing for the same reasons for which confidentiality of its contents is being requested.

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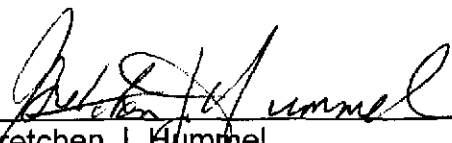
In the Matter of the Application of)	
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Costs Ordered Under Ohio Revised)	
Code 4928.144.)	

MEMORANDUM IN SUPPORT

Contemporaneous with this filing, IEU-Ohio has filed a Motion seeking, *inter alia*, a suspension of the Commission's procedural schedule in these proceedings and requesting an *in camera* hearing to consider the grounds on which the Motion is being made. The nature of the Motion and the basis for which confidentiality is sought were the subject of an *in camera* Bench Conference on October 14, 2011, and are extremely sensitive. The Motion should be provided the same confidential treatment the Attorney Examiner has ordered for the transcript of the Bench Conference.

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

Respectfully submitted,

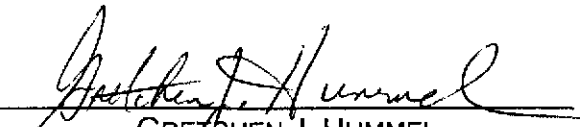


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CERTIFICATE OF SERVICE

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 17th day of October 2011, via electronic transmission, hand-delivery or first class mail, postage prepaid.


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