

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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 : Case No. **07-1224-GA-EXM**
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 : Case No. **11-6076-GA-EXM**
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 : Case No. **12-1842-GA-EXM**
Code, the Exemption Granted to **The East** :
Ohio Gas Company d/b/a Dominion East :
Ohio in Case No. 07-1224-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 _____

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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 winning 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

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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
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Case No(s). 07-1224-GA-EXM, 11-6076-GA-EXM, 12-1842-GA-EXM

Summary: Motion for a Protective Order submitted on behalf of the Staff of the Public Utilities Commission of Ohio by Assistant Attorney General Stephen A. Reilly electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio