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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Market Rate Offer.	)))	Case No. 12-426-EL-SSO
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs.	)))	Case No. 12-427-EL-ATA
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority.	))))	Case No. 12-428-EL-AAM
In the Matter of the Application of The Dayton Power and Light Company for Waiver of Certain Commission Rules.	)))	Case No. 12-429-EL-WVR
In the Matter of the Application of The Dayton Power and Light Company to Establish Tariff Riders.	)))	Case No. 12-672-EL-RDR

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

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March 1, 2013

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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 Answer 27, Question and Answer 28, Question and Answer 29, and Question 30 and the first paragraph of Answer 30 in the Direct Testimony of Joseph G. Bowser filed on behalf of IEU-Ohio on March 1, 2013 in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
The Dayton Power and Light Company	)	Case No. 12-426-EL-SSO
for Approval of Its Market Rate Offer.	)	

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for Approval of Revised Tariffs.	)	

In the Matter of the Application of	)	
The Dayton Power and Light Company	)	Case No. 12-428-EL-AAM
for Approval of Certain Accounting	)	
Authority.	)	

In the Matter of the Application of	)	
The Dayton Power and Light Company	)	Case No. 12-429-EL-WVR
for Waiver of Certain Commission Rules.	)	

In the Matter of the Application of	)	
The Dayton Power and Light Company	)	Case No. 12-672-EL-RDR
to Establish Tariff Riders.	)	

MEMORANDUM IN SUPPORT

Contemporaneous with this motion, IEU-Ohio has filed the Direct Testimony of Joseph G. Bowser in an unredacted form and under seal. By this motion, IEU-Ohio requests confidential treatment for Answer 27, Question and Answer 28, Question and Answer 29, and Question 30 and the first paragraph of Answer 30 in the Direct Testimony of Joseph G. Bowser. The Dayton Power & Light Company ("DP&L") has designated information contained in these portions of the testimony as confidential and competitively sensitive and produced the information subject to a protective agreement between DP&L 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 DP&L.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Samuel C. Randazzo", written over a horizontal line.

Samuel C. Randazzo (Counsel of Record)

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Attorneys for Industrial Energy Users-Ohio

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 1st day of March 2013, via electronic transmission, hand-delivery or first class mail, postage prepaid.



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