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, :

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) 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/ Thomas G. Lindgren

Thomas G. Lindgren

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On behalf of the Staff of The Public Utilities Commission of Ohio

MEMORANDUM IN SUPPORT

On February 2, 2016, 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/ Thomas G. Lindgren

Thomas G. Lindgren

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On behalf of the Staff of The Public Utilities Commission of Ohio

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 3d day of February, 2016.

/s/ Thomas G. Lindgren

Thomas G. LindgrenAssistant Attorney General

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Summary: Motion For Protective Order submitted on behalf of the Public Utilities Commission of Ohio. electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO