

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
The Dayton Power and Light Company	)	Case No. 16-395-EL-SSO
for Approval of its Electric Security Plan	)	
 In the Matter of the Application of	)	
The Dayton Power and Light Company	)	Case No. 16-396-EL-ATA
for Approval of Revised Tariffs	)	
 In the Matter of the Application of	)	
The Dayton Power and Light Company	)	
for Approval of Certain Accounting	)	Case No. 16-397-EL-AAM
Authority Pursuant to Ohio Rev.	)	
Code § 4904.13	)	

RECEIVED-PROTECTIVE ORDER
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MOTION FOR PROTECTIVE ORDER
BY SIERRA CLUB

Pursuant to Rule 4901-1-24, Ohio Administrative Code, Sierra Club respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a protective order for the confidentiality of portions of the Direct Testimony of Tyler Comings and the Direct Testimony of Christopher Walters, both of which were filed on November 21, 2016 in this proceeding. Sierra Club seeks this protective order for the reasons set forth in the attached Memorandum in Support.

Dated: November 21, 2016

Respectfully submitted,

/s/ Richard C. Sahli

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Attorneys for Sierra Club

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MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, Sierra Club has filed the Direct Testimony of Tyler Comings and the Direct Testimony of Christopher Walters with the Commission. Sierra Club has filed these testimonies in both a redacted form and in an unredacted form under seal. By this Motion, Sierra Club requests confidential treatment of the unredacted portions filed under seal.

The Dayton Power and Light Company (the "Company") has designated information contained in these testimonies as confidential or competitively sensitive confidential and has produced the information subject to a protective agreement between the Company and Sierra Club. Sierra Club reserves the right to challenge whether the information is a confidential trade secret under Ohio law, but files this Motion for Protective Order and Memorandum in Support pursuant to the protective agreement with the Company. Sierra Club respectfully requests that this Motion for Protective Order be granted for the reasons set forth herein.

Dated: November 21, 2016

Respectfully submitted,

/s/ Richard C. Sahli

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Attorneys for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing Motion for Protective Order by Sierra Club upon the following parties via electronic mail.

Date: November 21, 2016

s/ Richard Sahli

Richard Sahli

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