

FILE

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)	
The Dayton Power and Light Company for)	Case No. 16-0395-EL-SSO
Approval of Its Electric Security Plan)	
)	
In the Matter of the Application of)	
The Dayton Power and Light Company for)	Case No. 16-0396-EL-ATA
Approval of Revised Tariffs)	
)	
In the Matter of the Application of)	
The Dayton Power and Light Company for)	Case No. 16-0397-EL-ATA
Approval of Certain Accounting Authority)	
Pursuant to Ohio Rev. Code § 4905.13)	

MOTION FOR PROTECTIVE ORDER AND
AND MEMORANDUM IN SUPPORT OF INTERSTATE GAS SUPPLY, INC.

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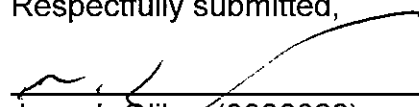
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Pursuant to Ohio Rev. Code § 4905.13)	

MOTION FOR PROTECTIVE ORDER

Pursuant to the provisions of Rule 4901-1-24, Ohio Administrative Code ("OAC"), Interstate Gas Supply, Inc. ("IGS" or "IGS Energy") respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of portions of the Direct Testimony of Edward Hess filed on February 12, 2019, in these proceedings. Specifically, IGS requests protective treatment with respect to portions of pages 21, 23, and 24, as well JEH-8 and JEH-11 for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, IGS has filed the Stipulation Direct Testimony of Edward Hess in a redacted form and in an unredacted form under seal. By this Motion, IGS requests confidential treatment of the unredacted portions filed under seal. The Dayton Power and Light Company ("DP&L") has designated information contained in these documents as confidential and competitively sensitive and produced the information subject to a protective agreement between DP&L and IGS in this proceeding. IGS reserves the right to challenge whether the formation 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 DP&L and IGS and RESA.

WHEREFORE, IGS 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 certify that this Motion to For Protective Order and Memorandum in Support of Interstate Gas Supply, Inc. was served electronically on the following parties on this 12th day of February 2019.

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