BEFORE

**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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

**MOTION FOR PROTECTIVE ORDER AND**

**AND MEMORANDUM IN SUPPORT OF INTERSTATE GAS SUPPLY, INC.**

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***Attorneys for IGS Energy***

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**MOTION FOR PROTECTIVE ORDER**

Pursuant to the provisions of Rule 4901-1-24, Ohio Administrative Code ("OAC”), Interstate Gas Supply, Inc. ("lGS" or “IGS Energy”) respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of portions of the Supplemental Post-Hearing Reply Brief in these proceedings. Specifically, IGS requests protective treatment with respect to portions of pages 5, 25, 26, 27, and 41 for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

**\_/s/ Joseph Oliker\_\_\_\_\_\_\_\_\_\_**

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**MEMORANDUM IN SUPPORT**

Contemporaneous with this Motion, IGS has filed the its Supplemental Post-Hearing Brief in a redacted form and in an unredacted form under seal. By this Motion, lGS 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 lGS 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.

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

Respectfully submitted,

**\_/s/ Joseph Oliker\_\_\_\_\_\_\_\_\_**

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***Attorneys for IGS Energy***

**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 30th day of May 2019.

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\_\_/s/ Joseph Oliker

Joseph Oliker