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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Joint Application of)
The East Ohio Gas Company d/b/a)
Dominion East Ohio, Constitution Gas)
Transport Co., Inc., and Knox Energy)
Cooperative Association, Inc., for)
Approval of the Transfer of Assets and)
Substitution of Service.)

PUCO

Case No. 11-4324-GA-ATR

**JOINT MOTION FOR PROTECTIVE ORDER OF
THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO,
CONSTITUTION GAS TRANSPORT CO., INC. AND
KNOX ENERGY COOPERATIVE ASSOCIATION, INC.**

Pursuant to Ohio Adm. Code 4901-1-24(D), The East Ohio Gas Company d/b/a Dominion East Ohio ("DEO"), Constitution Gas Transport Co., Inc. ("Constitution") and Knox Energy Cooperative Association, Inc. ("Knox") (collectively "Joint Applicants") respectfully move for a protective order to keep pricing information contained in Exhibit B, the Asset Purchase Agreement between Constitution and Knox, of the Joint Applicant's Application in this proceeding confidential and not part of the public record. The grounds in support of this requirement are more fully set forth in the attached Memorandum in Support. Consistent with the requirements of Ohio Adm. Code 4901-1-24(D), the Joint Applicants are submitting three unredacted copies of Exhibit B under seal. Accordingly, the Joint Applicants respectfully request that the Commission grant the Motion for a Protective Order.

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Respectfully submitted,

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Dominion East Ohio, Constitution Gas)	Case No. 11-_____-GA-ATR
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**MEMORANDUM IN SUPPORT OF
JOINT MOTION FOR PROTECTIVE ORDER OF
THE EAST OHIO GAS COMPANY D/B/A DOMINION EAST OHIO,
CONSTITUTION GAS TRANSPORT CO., INC. AND
KNOX ENERGY COOPERATIVE ASSOCIATION, INC.**

Exhibit B to the Joint Application For Transfer of Assets and Substitution of Service contains confidential trade secret information not available to the general public. Ohio Adm. Code 4901-1-24(D) allows parties to seek Commission authority to file documents redacted to prevent disclosure of information they consider to be a trade secret under Ohio law. Nondisclosure of information must also be consistent with the purpose of Title 49 of the Ohio Revised Code.

Ohio law defines a "trade secret" as,

(D) "Trade secret" means information, including the whole or any portion or phase of any scientific or technical information, design, process, procedure, formula, pattern, compilation, program, device, method, technique, or improvement, or any business information or plans, financial information, or listing of names, addresses, or telephone numbers, that satisfies both of the following:

(1) It derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

(2) It is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

R.C. 1333.16(D).

Exhibit B contains business information disclosing the negotiated and financial terms of the transactions for which the parties seek approval. The Commission has previously recognized that "negotiated price and quantity terms can be sensitive information in a competitive environment." *In the Matter of the Application of North Coast Gas Transmission LLC for Approval of a New Contract and Amendments to Three Existing Contracts*, Case No. 05-1214-PL-AEC, Entry (November 9, 2005) at Finding 5 (Granting a Motion to protect the price, volume and shrinkage factor information confidential). The Commission has also issued a protective order where the disclosure of a public utility's confidential business information would "jeopardize its business position in negotiations with other parties." *In the Matter of the Application of Vectren Retail LLC d/b/a Vectren Source for Certification as a Natural Gas Supplier in the State of Ohio*, Case No. 02-1668-GA-CRS, Entry (June 8, 2005) at Finding 3.

The redacted information contained in Exhibit B derives independent economic value from not being generally known to others. Disclosure of the specific financial details of the transaction would place the Joint Applications at a disadvantage in future negotiations for the purchase or sale of assets or customers. Being unable to competitively negotiate future transactions would likely result in a disadvantage to the ratepayers or members of the Joint Applicants. Therefore, revealing this financially sensitive information is not in the public interest and should be kept under seal.

The information the Joint Applicants seek to protect has also been subject to reasonable efforts to maintain its secrecy. The information contained in Exhibit B is only

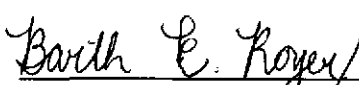
accessible by personnel with a legitimate business need to know or act upon the information. Further, consistent with Rule 4901-1-24(D), the Joint Applicants have minimized the amount of information protected from public disclosure by solely requesting protection of the Constitution/Knox asset purchase price.

Pursuant to Ohio Adm. Code 4901-1-24(D)(2), the Joint Applicants have marked page 4 of Exhibit B as "CONFIDENTIAL" in the three unredacted versions submitted under seal with this Motion. Further, the Joint Application was filed with the alleged confidential information redacted from Exhibit B for inclusion in the public case file as required by Ohio Adm. Code 4901-1-24(D)(1).

For the foregoing reasons, the Joint Applicants respectfully request that the information redacted from the Joint Application Exhibit B be protected from public disclosure and that the Commission grant this Motion for a Protective Order.

Respectfully submitted,

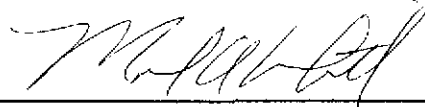
CONSTITUTION GAS TRANSPORT
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 *per e-mail authorization*
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