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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio Power )  
Company and Columbus Southern Power )  
Company for Authority to Merge and Related ) Case No. 10-2376-EL-UNC  
Approvals. )

In the Matter of the Application of Columbus )  
Southern Power Company and Ohio Power )  
Company for Authority to Establish a ) Case No. 11-346-EL-SSO  
Standard Service Offer Pursuant to ) Case No. 11-348-EL-SSO  
§4928.143, Ohio Rev. Code, in the Form of an )  
Electric Security Plan. )

In the Matter of the Application of Columbus )  
Southern Power Company and Ohio Power ) Case No. 11-349-EL-AAM  
Company for Approval of Certain Accounting ) Case No. 11-350-EL-AAM  
Authority. )

In the Matter of the Application of Columbus )  
Southern Power Company to Amend its ) Case No. 10-343-EL-ATA  
Emergency Curtailment Service Riders. )

In the Matter of the Application of Ohio Power )  
Company to Amend its Emergency ) Case No. 10-344-EL-ATA  
Curtailment Service Riders. )

In the Matter of the Commission Review Of )  
the Capacity Charges of Ohio Power ) Case No. 10-2929-EL-UNC  
Company and Columbus Southern Power )  
Company. )

In the Matter of the Application of Columbus )  
Southern Power Company for Approval of a ) Case No. 11-4920-EL-RDR  
Mechanism to Recover Deferred Fuel Costs )  
Ordered Under Ohio Revised Code 4928.144. )

In the Matter of the Application of Ohio Power )  
Company for Approval of a Mechanism to ) Case No. 11-4921-EL-RDR  
Recover Deferred Fuel Costs Ordered Under )  
Ohio Revised Code 4928.144. )

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MOTION FOR PROTECTIVE TREATMENT OF REPLY TO INDUSTRIAL ENERGY  
USERS-OHIO'S MOTION TO DISQUALIFY

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On October 14, 2011, Industrial Energy Users-Ohio ("IEU") requested a closed bench conference with counsel for the OMA Energy Group ("OMAEG"). The Attorney Examiner explained that she would keep the portion of the transcript on the bench conference closed until further notice.

In light of the nature of the Reply and pursuant to Rule 4901-1-24(D), Ohio Administrative Code ("OAC"), counsel for the OMAEG hereby moves the Commission for a protective order to shield the Reply from the public record unless and until the Commission determines otherwise. The grounds for the Motion are set forth in the attached Memorandum in Support.

Consistent with the requirements of Rule 4901-1-24(D), OAC, counsel for OMAEG has filed under seal three (3) unredacted copies of the confidential Reply that are the subject of this motion.

Respectfully submitted,



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)  
) Case No. 11-4921-EL-RDR  
)

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**MEMORANDUM IN SUPPORT**

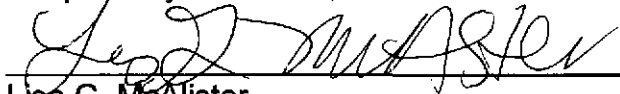
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Rule 4901-1-24(D), OAC, provides that the Commission or certain designated Commission employees may issue an order "which is necessary to protect the confidentiality of information contained in the document, to the extent that state or federal law prohibits release of the information, including where the information is deemed . . . to constitute a trade secret under Ohio law, and where nondisclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code."

Counsel for OMA asserts that the information being submitted in its Reply are of such a sensitive nature that it should be given confidential treatment unless and until the Commission orders otherwise.

Moreover, the information relates to discussions had during a bench conference that the Attorney Examiner has deemed closed until further notice. In respect of that ruling, OMAEG requests that the Reply be kept confidential unless and until the Commission orders otherwise.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion for Protective Treatment was served via electronic mail upon the following, this 17th day of October 2011.



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Lisa McAlister

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