

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of :
Vectren Energy Delivery of Ohio, Inc., for :
Approval of a General Exemption of : Case No. 07-1285-GA-EXM
Certain Natural Gas Commodity Sales :
Services or Ancillary Services. :

MOTION FOR A PROTECTIVE ORDER
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO

The Staff of the Public Utilities Commission of Ohio (Staff) hereby requests that the names of the participating bidders in the recent auction for natural gas supplies be kept confidential for fifteen days pursuant to O.A.C. 4901-1-24. The accompanying memorandum in support sets forth the grounds for this motion.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

William L. Wright
Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorneys General
Public Utilities Section
180 East Broad Street, 6th Floor
Columbus, OH 43215-3793
614.466.4397 (telephone)
614.644.8764 (fax)
thomas.lindgren@puc.state.oh.us

MEMORANDUM IN SUPPORT

On January 15, 2013, an auction was held to procure natural gas supplies for Standard Service Offer (SSO) and Standard Choice Offer (SCO) customers of Vectren Energy Delivery of Ohio, Inc. (VEDO). On the same date, the Staff filed a report concerning the results of the auction. In this report, Staff does not disclose the names of the participating and winning bidders.

Staff requests that the names of the participating and winning bidders be kept confidential for a period of fifteen days. This is necessary in order to protect the bidders' positions in negotiations with pipelines for the incremental capacity necessary to meet their obligations to deliver gas if chosen as a supplier. This information warrants protection as a trade secret because immediate release of this information would cause serious economic harm to the auction participants. Therefore, the Commission should grant a protective order keeping this information under seal for a period of fifteen days.

Respectfully submitted,

Michael DeWine
Ohio Attorney General

William L. Wright
Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorneys General
Public Utilities Section
180 East Broad Street, 6th Floor
Columbus, OH 43215-3793
614.466.4397 (telephone)
614.644.8764 (fax)
thomas.lindgren@puc.state.oh.us

PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Protective Order** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, or hand-delivered, upon the following Parties of Record, this 15th day of January, 2013.

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorney General

Parties of Record:

Gretchen J. Hummel
Samuel C. Randazzo
McNees Wallace & Nurick
21 East State Street, 17th Floor
Columbus, OH 43215
ghummel@mwncmh.com
sam@mwncmh.com

Andrew J. Campbell
Jones Day
325 John McConnell Boulevard
Suite 600
Columbus, OH 43215
ajcampbell@jonesday.com

Thomas J. O'Brien
Bricker & Eckler
100 South Third Street
Columbus, OH 43215
tobrien@bricker.com

Shelley Greene
DTE Energy Trading, Inc.
414 South Main Street, Suite 200
Ann Arbor, MI 48104
greens@dteenergy.com

Howard M. Petricoff
Jonathan W. Airey
Vorys Sater Seymour & Pease
52 East Gay Street
P.O. Box 1008
Columbus, OH 43216-1008
mhpetricoff@vssp.com
wjairey@vssp.com

Barth E. Royer
Bell & Royer
33 South Grant Avenue
Columbus, OH 43215-3927
barthroyer@aol.com

Gary A. Jeffries
Dominion Retail
501 Martindale Street
Suite 400
Pittsburg, PA 15212-5817
gary.a.jeffries@dom.com

Amy Klavitar
Integrys Energy Services, Inc.
500 West Madison Street, Suite 3300
Chicago, IL 60661
aklavitar@integrysenergy.com

Joseph Serio
Office of the Ohio Consumers' Counsel
10 West Broad Street, Suite 1800
Columbus, OH 43215-3485
serio@occ.state.oh.us

David C. Rinebolt
Ohio Partners for Affordable Energy
231 West Lima Street
P.O. Box 1793
Findlay, OH 45839-1793
drinebolt@aol.com

John Dosker
Stand Energy Corporation
1077 Celestial Street, Suite 110
Cincinnati, OH 45202-1629
jdosker@standenergy.com

Bobby Singh
Integrys Energy Services, Inc.
300 West Wilson Bridge Road, Suite 350
Worthington, OH 43054
bsingh@integrysenergy.com

Christopher D. Young
MXEnergy, Inc.
100 Constellation Way
Suite 500C
Baltimore, MD 21202
christopher.young@constellation.com

Larry Gearhardt
Ohio Farm Bureau Development Corp.
280 North High Street
P.O. Box 182383
Columbus, OH 43218
lgearhardt@ofbr.org

Colleen L. Mooney
Ohio Partners for Affordable Energy
1431 Mulford Road
Columbus, OH 43212
cmooney2@columbus.rr.com

Trish McFadin
Southstar Energy Services
817 West Peachtree Street, N.W.
Suite 1000
Atlanta, GA 30308
trish.mcfadin@southstarenergy.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

1/15/2013 3:02:09 PM

in

Case No(s). 07-1285-GA-EXM

Summary: Motion for a Protective Order submitted on behalf of the Staff of the Public Utilities Commission of Ohio by Assistant Attorney General Thomas G. Lindgren. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio