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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) Case No. 12-426-EL-SSO
- In the Matter of the Application of)
The Dayton Power and Light Company for)
Approval of Revised Tariffs) Case No. 12-427-EL-ATA
- In the Matter of the Application of)
The Dayton Power and Light Company for)
Approval of Certain Accounting Authority) Case No. 12-428-EL-AAM
- In the Matter of the Application of)
The Dayton Power and Light Company for)
the Waiver of Certain Commission Rules) Case No. 12-429-EL-WVR
- In the Matter of the Application of)
The Dayton Power and Light Company)
to Establish Tariff Riders) Case No. 12-672-EL-RDR

MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR PROTECTIVE ORDER
AND MEMORANDUM IN SUPPORT

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February 22, 2013

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**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR PROTECTIVE ORDER**

Pursuant to the provisions of Rule 4901-1-24(D), Ohio Administrative Code ("O.A.C."), the Industrial Energy Users-Ohio ("IEU-Ohio") respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a protective order for the confidential portions of the Motion of IEU-Ohio to Compel Discovery Responses from the Dayton Power and Light Company and Memorandum in Support ("Motion to Compel") filed on behalf of IEU-Ohio on February 21, 2013 in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, IEU-Ohio has filed its Motion to Compel the Dayton Power and Light Company ("DP&L"). By this Motion, IEU-Ohio requests confidential treatment of portions of its Motion to Compel. The portions for which protection is sought refer to the contents of discovery responses IEU-Ohio received pursuant to a stipulated protective agreement with DP&L as well as a portion of a deposition transcript (DP&L has not yet indicated what portions of the transcript are confidential). IEU-Ohio takes no position as to whether the information is a confidential

trade secret under Ohio law, but files this Motion pursuant to a stipulated protective agreement executed by IEU-Ohio and DP&L.

WHEREFORE, IEU-Ohio respectfully requests that this Motion be granted for the reasons set forth herein.

Respectfully submitted,



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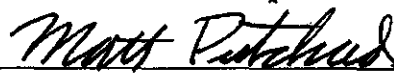
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion of Industrial Energy Users-Ohio for Protective Order and Memorandum in Support* was served upon the following parties of record this 22nd day of February 2013, via electronic transmission, hand-delivery or first class mail, postage prepaid.



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