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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO 2013 MAR -1 PM 3:09

In the Matter of the Application of)
The Dayton Power and Light Company) Case No. 12-426-EL-SSO
for Approval of Its Market Rate Offer.)

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In the Matter of the Application of)
The Dayton Power and Light Company) Case No. 12-427-EL-ATA
for Approval of Revised Tariffs.)

In the Matter of the Application of)
The Dayton Power and Light Company) Case No. 12-428-EL-AAM
for Approval of Certain Accounting)
Authority.)

In the Matter of the Application of)
The Dayton Power and Light Company) Case No. 12-429-EL-WVR
for Waiver of Certain Commission Rules.)

In the Matter of the Application of)
The Dayton Power and Light Company) Case No. 12-672-EL-RDR
to Establish Tariff Riders.)

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

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March 1, 2013

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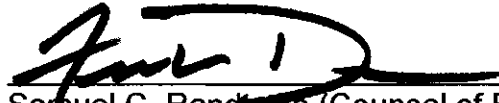
**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Market Rate Offer.)))	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 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**

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 confidentiality of the responses to Questions 15, 17, 20, 21, 22, 23, 24, 25, 26, 31, 34, 35, 39, Question 19 and the response to Question 19, Exhibit KMM-2, and Exhibits KMM-6 through KMM-12 in the direct testimony of Kevin M. Murray filed on behalf of IEU-Ohio on March 1, 2013 in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Market Rate Offer.)))	Case No. 12-426-EL-SSO
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In the Matter of the Application of The Dayton Power and Light Company for 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

MEMORANDUM IN SUPPORT

Contemporaneous with this motion, IEU-Ohio has filed the direct testimony of Kevin M. Murray in an unredacted form and under seal. By this motion, IEU-Ohio requests confidential treatment for the responses to Questions 15, 17, 20, 21, 22, 23, 24, 25, 26, 31, 34, 35, 39, Question 19 and the response to Question 19, Exhibit KMM-2, and Exhibits KMM-6 through KMM-12 in the direct testimony of Kevin M. Murray. The Dayton Power & Light Company ("DP&L") has designated the material in the responses as confidential and competitively sensitive and produced the material subject to a protective agreement between DP&L and IEU-Ohio. IEU-Ohio takes no position as to

whether the information 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 IEU-Ohio and DP&L.

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

Respectfully submitted,



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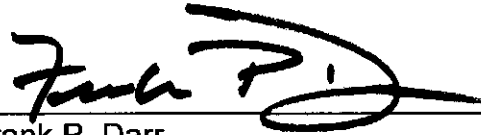
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CERTIFICATE OF SERVICE

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 1st day of March 2013, via electronic transmission, hand-delivery or first class mail, postage prepaid.



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