

**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
AND MEMORANDUM IN SUPPORT**

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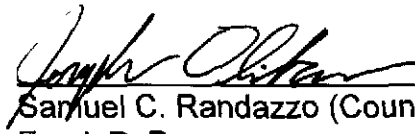
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**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR PROTECTIVE ORDER**

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 confidentiality of the Memorandum Contra Applications for Rehearing ("Memorandum Contra") of IEU-Ohio filed on October 31, 2013, in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Samuel C. Randazzo", is written over a horizontal line.

Samuel C. Randazzo (Counsel of Record)

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MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, IEU-Ohio has filed its Memorandum Contra in a redacted form and in an unredacted form under seal. By this Motion, IEU-Ohio requests confidential treatment of the unredacted portions filed under seal. The Dayton Power & Light Company ("DP&L") has designated information contained in these portions of the Memorandum Contra as confidential and competitively sensitive and produced the information 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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Attorneys for Industrial Energy Users-Ohio

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 31st day of October 2013, via electronic transmission, hand-delivery or first class mail, postage prepaid.


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