BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of)
The Dayton Power and Light Company) Case No. 11-5730-EL-FAC
to Establish a Fuel Rider.)

THE DAYTON POWER AND LIGHT COMPANY'S MOTION FOR CONTINUATION OF THE PROTECTIVE ORDER TO PROTECT THE CONFIDENTIALITY OF THE INFORMATION CONTAINED IN THE DOCUMENT TITLED "REPORT OF THE MANAGEMENT/PERFORMANCE AND FINANICIAL AUDIT OF THE FUEL AND PURCHASED POWER RIDER OF THE DAYTON POWER AND LIGHT COMPANY(11-5730-EL-FAC)

The Dayton Power and Light Company ("DP&L" or "the Company") previously moved, pursuant to Ohio Administrative Code §4901-1-24(D), for a protective order so that certain information contained in the document titled "Report of the Management/Performance and Financial Audit of the Fuel and Purchased Power Rider of the Dayton Power and Light Company (11-5730-EL-FAC) would be filed under seal." The motion for protective treatment was granted in the Entry of August 27, 2012. By this motion, pursuant to OAC §4901-1-24(F), DP&L requests that the Commission continue the Order issued on August 27, 2012 to indicate that this data, filed under seal, should be maintained at the Commission in a separate file which has restricted access. The reasons in support of this motion are fully explained in the attached memorandum.

Respectfully submitted,

Randall V. Griffin (0080499)

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Company

MEMORANDUM IN SUPPORT

DP&L moves that confidential information contained in the unreducted version of the Audit Report continue to be protected from disclosure and that the public version of the Audit Report remains available through the Commission's normal disclosure process.

Confidential information appears throughout the Audit Report and could not be easily segregated into a specific section or sections. Specifically the Audit Report describes DP&L's procurement strategy, contract information, purchase power information, generation information, and general business strategy. This information remains relevant to the operation of DP&L's generation fleet.

The trade secret information, if publicly disclosed, would give DP&L's competitors access to competitively sensitive, confidential information, which would allow suppliers to make offers to sell coal, and competitors to offer power etc. at prices other than they might offer in the absence of such information and to the detriment of DP&L and its customers.

WHEREFORE, DP&L respectfully requests that the Commission, pursuant to Ohio Administrative Code §4901-1-24(F), grant its Motion to Continue the Protective Order to Protect the Confidentiality of Information Contained in the document titled "Report of the Management/Performance and Financial Audit of the Fuel and Purchased Power Rider of the Dayton Power and Light Company (11-5730-EL-FAC)," by making a determination that the Confidential Material is confidential, proprietary and a trade secret under Ohio Revised Code §1333.61.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Motion for Protective Order was served on the following parties this 13th day of January 2014, by electronic delivery.

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Summary: Motion of The Dayton Power and Light Company for an Extension of the Protective Order and Memorandum in Support electronically filed by Mrs. Jessica E Kellie on behalf of The Dayton Power and Light Company