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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of Application of Duke)
Energy Ohio, Inc. for Authority to Establish)
a Standard Service Offer Pursuant to R.C.)
4928.143, in the Form of an Electric)
Security Plan, Accounting Modifications,)
and Tariffs for Generation Service.)

Case No. 14-841-EL-SSO

In the Matter of Application of Duke)
Energy Ohio, Inc. for Authority to Amend)
its Certified Supplier Tariff, P.U.C.O. No.)
20.)

Case No. 14-842-EL-ATA

MOTION FOR PROTECTIVE ORDER AND MEMORANDUM IN SUPPORT OF IGS
ENERGY

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September 26, 2014

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a Standard Service Offer Pursuant to R.C.) Case No. 14-841-EL-SSO
4928.143, in the Form of an Electric)
Security Plan, Accounting Modifications,)
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MOTION FOR PROTECTIVE ORDER

Respectfully submitted,

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Attorney for IGS Energy

**BEFORE
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Energy Ohio, Inc. for Authority to Amend)
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20.)

MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, IGS has filed the Direct Testimony of Tim Hamilton (and exhibits) in a redacted form and in an unredacted form under seal. By this Motion, IGS requests confidential treatment of the unredacted portions filed under seal. Duke Energy Ohio ("Duke") has designated information contained in these portions of the Direct Testimony of Tim Hamilton and Exhibits TH-4,5,6,7,8, and 9 as confidential and competitively sensitive and produced the information subject to a protective agreement between Duke and IGS. IGS 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 Duke and IGS.

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

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Joseph Olikar", is written over a horizontal line.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Motion for Protective Order and Memorandum in Support of IGS Energy* was served this 26nd day of September 26 2014 via electronic mail upon the following:


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