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BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of	)	
Columbus Southern Power Company and	)	
Ohio Power Company for Authority to	)	Case No. 05-376-EL-UNC
Recover Costs Associated with the	)	
Construction and Operation of an	)	
Integrated Gasification Combined	)	
Cycle Electric Generating Facility.	)	

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

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NOVEMBER 6, 2014

ON BEHALF OF INDUSTRIAL ENERGY USERS-OHIO

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

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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 that provides that the unredacted Direct Testimony of Kevin M. Murray filed on behalf of IEU-Ohio on November 6, 2014 in this proceeding remain under seal for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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**MEMORANDUM IN SUPPORT**

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IEU-Ohio has filed the Direct Testimony of Kevin M. Murray in an unredacted form and under seal. By this motion, IEU-Ohio requests that the Commission issue an order that provides that the unredacted testimony remain under seal. The Ohio Power Company ("AEP-Ohio") has designated information contained in portions of the testimony as confidential and competitively sensitive and produced the information subject to a protective agreement between AEP-Ohio and IEU-Ohio. IEU-Ohio has filed a redacted version of this testimony separately and has endeavored to redact at the minimal amount necessary to assure compliance with its agreement with AEP-Ohio. IEU-Ohio takes no position as to whether the redacted information may be nonpublic information under Ohio law, but files this Motion for Protective Order and Memorandum in Support pursuant to a protective agreement executed by IEU-Ohio and AEP-Ohio.

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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## CERTIFICATE OF SERVICE

In accordance with Rule 4901-1-05, Ohio Administrative Code, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion of Industrial Energy Users-Ohio for Protective Order and Memorandum in Support* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 6th day of November 2014, via electronic transmission.



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