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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 ) Case No. 16-395-EL-SSO  
Approval of Its Electric Security Plan )

In the Matter of the Application of )  
The Dayton Power and Light Company for ) Case No. 16-396-EL-ATA  
Approval of Revised Tariffs )

In the Matter of the Application of )  
The Dayton Power and Light Company for ) Case No. 16-397-EL-AAM  
Approval of Certain Accounting Authority )  
Pursuant to Ohio Rev. Code § 4905.13 )

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

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April 29, 2016

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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 for the confidentiality of the Industrial Energy Users-Ohio's Memorandum Contra the Motion of the Dayton Power and Light Company to Implement the SSR Extension Rider ("Memorandum Contra") filed on April 14, 2016, in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

  
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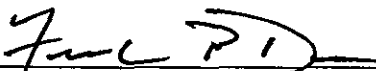
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**MEMORANDUM IN SUPPORT**

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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 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 the protective agreement executed by IEU-Ohio and DP&L.

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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 April 29, 2016, *via* electronic transmission, hand-delivery or first class mail, postage prepaid.



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