

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Waterville)	
Gas Company for Approval of Contract with)	
Johns Manville International, Inc.)	Case No. 11-5437-GA-AEC
)	

MOTION TO EXTEND PROTECTIVE ORDER

Waterville Gas Company (“Waterville” or “Applicant”), hereby moves pursuant to Rule 4901-1-24(F), Ohio Administrative Code (“OAC”) for the extension of a protective order entered by Attorney Examiner Kerry Sheets in an Entry dated January 14, 2015, to preserve the confidentiality of volume and price information contained in Exhibit A attached to the “Full Requirements Natural Gas Transportation Service Agreement” submitted as Attachment A to the Application by Waterville for approval pursuant to Ohio Rev. Code §4905.31 in this proceeding. The basis for this motion is set forth in the accompanying Memorandum in Support. Movant submits that the non-disclosure of this confidential information is not inconsistent with the purposes of Title 49, Ohio Revised Code. Furthermore, Waterville submits that public disclosure of individual shipper’s volumes and costs will continue to have a deleterious effect on competition. In conformance with Rule 4901-1-24(D) (2), OAC, three unredacted copies of the document containing the information for which extended protection is sought were filed under seal in this case on October 13, 2011.

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Respectfully submitted,

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**MEMORANDUM IN SUPPORT
OF
MOTION TO EXTEND PROTECTIVE ORDER**

Waterville requests that the price and volume information contained in Exhibit A (which was appended to the agreement set forth in Attachment A to its Application filed under seal on October 13, 2011) continue to be protected from public disclosure. Waterville submits that both parties to the agreement might be harmed by such public disclosure by providing competitors with proprietary trade secret information. Waterville notes that Johns Manville International, Inc. requested that Waterville seek protection for this trade secret information. Waterville agrees that the price and volume information needs to be kept confidential. Waterville competes directly with another public utility that has a direct connection with another nearby manufacturing facility of Johns Manville.

In Entry dated January 14, 2015, the Attorney Examiner found that this information contained in Waterville's Application contained trade secret information; that its release is not prohibited under state law; and that the nondisclosure of this information is not inconsistent with the purposes of Title 49 of the Ohio Revised Code (Entry, p. 2, ¶6). Waterville submits that the

information continues to constitute trade secret information and that the Findings of the January 14, 2015, Entry remain valid.

The Entry also properly noted that the protective order granted on January 14, 2015, would automatically expire after 24 months from the date of the Entry (January 15, 2017), unless Waterville filed this motion at least 45 days in advance of the expiration date, pursuant to Ohio Admin. Code Rule 4901-1-24(F). Waterville has now complied with that requirement by the filing of this Motion and Memorandum in Support.

WHEREFORE, Waterville respectfully requests that the protective order granted in the Entry in this case on January 14, 2015, be extended for an additional twenty-four (24) months for good cause shown.

Respectfully submitted,

/s/Christopher J. Allwein
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This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

11/23/2016 2:13:10 PM

in

Case No(s). 11-5437-GA-AEC

Summary: Motion to Extend Protective Order electronically filed by Mr. Christopher J. Allwein
on behalf of Waterville Gas Company