

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton Power and Light Company for Approval of Its Electric Security Plan	) ) ) )	Case No. 16-0395-EL-SSO
In the Matter of the Application of The Dayton Power and Light Company for Approval of Revised Tariffs	) ) ) )	Case No. 16-0396-EL-ATA
In the Matter of the Application of The Dayton Power and Light Company for Approval of Certain Accounting Authority Pursuant to Ohio Rev. Code § 4905.13	) ) ) )	Case No. 16-0397-EL-ATA

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**JOINT MOTION FOR PROTECTIVE ORDER  
AND MEMORANDUM IN SUPPORT OF INTERSTATE GAS SUPPLY, INC. AND THE  
RETAIL ENERGY SUPPLY ASSOCIATION**

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**Attorneys for the Retail Energy  
Supply Association**

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The Dayton Power and Light Company for	)	Case No. 16-0395-EL-SSO
Approval of Its Electric Security Plan	)	
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Approval of Revised Tariffs	)	
	)	
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The Dayton Power and Light Company for	)	Case No. 16-0397-EL-ATA
Approval of Certain Accounting Authority	)	
Pursuant to Ohio Rev. Code § 4905.13	)	

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**JOINT MOTION FOR PROTECTIVE ORDER**

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Pursuant to the provisions of Rule 4901-1-24, Ohio Administrative Code ("OAC"), Interstate Gas Supply, Inc. ("IGS" or "IGS Energy") and the Retail Energy Supply Association ("RESA") respectfully request that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of Stipulation Exhibit MW5 attached to the Stipulation Direct Testimony of Matthew White filed on February 6,

2017, in these proceedings for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Joseph Oliker per authorization

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**Attorneys for the Retail Energy  
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Approval of Certain Accounting Authority	)	
Pursuant to Ohio Rev. Code § 4905.13	)	

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**MEMORANDUM IN SUPPORT  
OF THE JOINT MOTION FOR PROTECTIVE ORDER**

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Contemporaneous with this Motion, IGS and RESA have jointly filed the Stipulation Direct Testimony of Matthew White in both a redacted form and in an unredacted form under seal. By this Motion, IGS and RESA request confidential treatment of the unredacted portions filed under seal. The Dayton Power and Light Company (“DP&L”) has designated certain information contained in Stipulation Exhibit MW5 as confidential and competitively sensitive, and produced the information subject to protective agreements between DP&L and IGS and DP&L and RESA, which were entered into in Case Nos. 15-1830-EL-AIR et al. and in this proceeding.<sup>1</sup> IGS and RESA reserve the right to challenge whether the information is a confidential trade secret under Ohio law, but file this Joint Motion for Protective Order and Memorandum

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<sup>1</sup> RESA is not currently a party to Case Nos. 15-1830-EL-AIR et al.

in Support pursuant to their respective protective agreements with DP&L. Thus, the designated information in Exhibit MW5 should be maintained as confidential until such time as it is found to not be confidential.

WHEREFORE, IGS and RESA respectfully request that this Joint Motion for Protective Order be granted for the reasons set forth herein.

Respectfully submitted,

/s/ Joseph Olikier per authorization  
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## **CERTIFICATE OF SERVICE**

The Public Utilities Commission of Ohio e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that this Joint Motion to For Protective Order and Memorandum in Support of Interstate Gas Supply, Inc. and the Retail Energy Supply Association is also being served electronically on the following parties on this 6th day of February 2017.

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/s/ Gretchen L. Petrucci  
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**This foregoing document was electronically filed with the Public Utilities**

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**Case No(s). 16-0395-EL-SSO, 16-0396-EL-ATA, 16-0397-EL-AAM**

Summary: Motion -- Joint Motion for Protective Order and Memorandum in Support electronically filed by Mrs. Gretchen L. Petrucci on behalf of Interstate Gas Supply, Inc. and Retail Energy Supply Association