

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

Suburban Natural Gas Company,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. 17-2168-GA-CSS
	)	
Columbia Gas of Ohio, Inc.,	)	
	)	
Respondent.	)	

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**MOTION FOR PROTECTIVE ORDER  
OF COLUMBIA GAS OF OHIO, INC.**

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Pursuant to Rule 4901-1-24(D), Ohio Adm. Code, Respondent Columbia Gas of Ohio, Inc. ("Columbia") requests protective treatment of certain information and documents referenced in and/or attached to Columbia's pre-filed testimony that Complainant Suburban Natural Gas Company ("Suburban") originally produced pursuant to a protective agreement between the parties. A Memorandum in Support of this Motion is attached.

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## MEMORANDUM IN SUPPORT

On February 15 and 16, 2018, Columbia and Suburban entered into a protective agreement designed to facilitate and expedite the exchange of information in the discovery process in this proceeding. Pursuant to that protective agreement, Suburban produced certain information and documents to Columbia that it asserted was confidential or highly confidential.

Under the protective agreement, any party including, using, or referring to confidential or highly confidential materials in any filing must file those materials under seal. Accordingly, Columbia is filing a redacted, public version of the pre-filed testimony of its witness Melissa L. Thompson. Columbia also is filing a confidential version of that testimony, under seal, that references and attaches information and documents that Suburban claims to be either confidential or highly confidential.

Columbia does not concede or assert that the redacted information and/or materials qualify for protection under Rule 4901-1-24(D), Ohio Adm. Code. The parties' protective agreement contemplates that Suburban will file its own motion for protective order within five business days, demonstrating the reasons for protecting the confidentiality of the redacted testimony and documents.

For these reasons, Columbia respectfully requests that the Commission grant its motion for protective order pending Suburban's filing of a motion for protective order with regard to the redacted information and/or documents and the Commission's consideration of any such motion. If Suburban does not file such a motion, Columbia respectfully requests that the Commission unseal the confidential version of Ms. Thompson's pre-filed testimony.

Respectfully submitted,

/s/ Mark S. Stemm

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**CERTIFICATE OF SERVICE**

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 16th day of March, 2018, upon the parties listed below.

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*/s/ Eric B. Gallon* \_\_\_\_\_

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**This foregoing document was electronically filed with the Public Utilities**

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Summary: Motion for Protective Order electronically filed by Mr. Eric B. Gallon on behalf of Columbia Gas of Ohio, Inc.