

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
The Dayton Power and Light Company for	)	Case No. 16-0395-EL-SSO
Approval of Its Electric Security Plan	)	
	)	
In the Matter of the Application of	)	
The Dayton Power and Light Company for	)	Case No. 16-0396-EL-ATA
Approval of Revised Tariffs	)	
	)	
In the Matter of the Application of	)	
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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**MOTION FOR PROTECTIVE ORDER AND  
AND MEMORANDUM IN SUPPORT OF INTERSTATE GAS SUPPLY, INC.**

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**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") respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of portions of the Supplemental Post-Hearing Brief in these proceedings. Specifically, IGS requests protective treatment with respect to portions of pages 6, 34 and 47 for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

**/s/ Joseph Olikier**

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**MEMORANDUM IN SUPPORT**

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Contemporaneous with this Motion, IGS has filed the its Supplemental Post-Hearing Brief in a redacted form and in an unredacted form under seal. By this Motion, IGS requests confidential treatment of the unredacted portions filed under seal. The Dayton Power and Light Company (“DP&L”) has designated information contained in these documents as confidential and competitively sensitive and produced the information subject to a protective agreement between DP&L and IGS in this proceeding. IGS reserves the right to challenge whether the formation is a confidential trade secret under Ohio law, but files this Motion for Protective Order and Memorandum in Support pursuant to a protective agreement executed by DP&L and IGS.

WHEREFORE, IGS respectfully requests that this Motion for Protective Order be granted for the reasons set forth herein.

Respectfully submitted,

**/s/ Joseph Oliker**

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## CERTIFICATE OF SERVICE

I certify that this Motion to For Protective Order and Memorandum in Support of Interstate Gas Supply, Inc. was served electronically on the following parties on this 15th day of May 2019.

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

Summary: Motion for Protective Order and Memorandum in Support electronically filed by Mr. Joseph E. Oliker on behalf of IGS Energy