

**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)	

**MOTION FOR PROTECTIVE ORDER AND
AND MEMORANDUM IN SUPPORT OF INTERSTATE GAS SUPPLY, INC.**

Joseph Olikier (0086088)
Email: joliker@igsenergy.com
Counsel of Record
Michael Nugent (0090408)
Email: Mnugent@igsenergy.com
IGS Energy
6100 Emerald Parkway
Dublin, Ohio 43016
Telephone: (614) 659-5000
Facsimile: (614) 659-5073

Attorneys for IGS Energy

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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)	

MOTION FOR PROTECTIVE ORDER

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 Reply Brief in these proceedings. Specifically, IGS requests protective treatment with respect to portions of pages 5, 25, 26, 27, and 41 for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Joseph Olikier
Joseph Olikier (0086088)
Counsel of Record
Email: joliker@igsenergy.com
Michael Nugent (0090408)
Email: Mnugent@igsenergy.com
IGS Energy
6100 Emerald Parkway

Dublin, Ohio 43016
Telephone: (614) 659-5000
Attorneys for IGS Energy

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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

MEMORANDUM IN SUPPORT

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

Joseph Oliker (0086088)

Counsel of Record

Email: joliker@igsenergy.com

Michael Nugent (0090408)

Email: mnugent@igsenergy.com

IGS Energy

6100 Emerald Parkway

Dublin, Ohio 43016

Telephone: (614) 659-5000

Facsimile: (614) 659-5073

Attorneys for IGS Energy

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 30th day of May 2019.

djieland@ficlaw.com
jsharkey@ficlaw.com
mfleisher@elpc.org
fdarr@mwncmh.com
mpritchard@mwncmh.com
jeffrey.mayes@monitoringanalytics.com
evelyn.robinson@pjm.com
schmidt@sppgrp.com
dboehm@BKLawfirm.com
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
kylercohn@BKLawfirm.com
william.wright@ohioattorneygeneral.gov
Michelle.d.grant@dynegy.com
rsahli@columbus.rr.com
slesser@calfee.com
jiang@calfee.com
talexander@calfee.com
lhawrot@spilmanlaw.com
dwilliamson@spilmanlaw.com
charris@spilmanlaw.com
gthomas@gtpowergroup.com
laurac@chappelleconsulting.net
stheodore@epsa.org
todonnell@dickinsonwright.com
rseiler@dickinsonwright.com
jeanne.kingery@duke-energy.com
kristin.henry@sierraclub.org
thomas.mcnamee@ohioattorneygeneral.gov

joliker@igsenergy.com
bojko@carpenterlipps.com
ghiloni@carpenterlipps.com
mjsettineri@vorys.com
smhoward@vorys.com
glpetrucci@vorys.com
ibatikov@vorys.com
wasieck@vorys.com
william.michael@occ.ohio.gov
kevin.moore@occ.ohio.gov
mdortch@kravitzllc.com
tdougherty@theOEC.org
cmooney@ohiopartners.org
sechler@carpenterlipps.com
gpoulos@enernoc.com
rick.sites@ohiohospitals.org
amy.spiller@duke-energy.com
elizabeth.watts@duke-energy.com
stephen.chriss@walmart.com
greg.tillman@walmart.com
mwarnock@bricker.com
dborchers@bricker.com
ejacobs@ablelaw.org
tony.mendoza@sierraclub.org
chris@envlaw.com
jdoll@djflawfirm.com
mccrawford@djflawfirm.com
dparram@bricker.com
paul@carpenterlipps.com

/s/ Joseph Olikier
Joseph Olikier

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

Summary: Motion electronically filed by Helen Sweeney on behalf of IGS Energy