

BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Complaint of Interstate Gas Supply, Inc., d/b/a IGS Energy, v. Santanna Natural Gas Corporation, d/b/a Santanna Energy Services, for Actions in Violation of the Ohio Revised and Administrative Codes. )

Case No. 19-362-GE-CSS

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MOTION FOR PROTECTIVE ORDER

Pursuant to Ohio Adm. Code 4901-1-24(D), Santanna Natural Gas Corporation d/b/a Santanna Energy Services (Santanna) moves the Public Utilities Commission of Ohio (Commission) for a protective order to keep confidential, and not offer as part of the public record, Attachments A, B, and C to Santanna's Motion for a Protective Order against Interstate Gas Supply, Inc., d/b/a IGS Energy (IGS) in order to prevent the disclosure of customer names and other personal information. The reasons underlying this motion are set forth in the attached Memorandum in Support. Consistent with the requirements of Ohio Adm. Code 4901-1-24(D), two unredacted copies of Attachments A, B, and C are submitted herewith under seal.

Respectfully submitted,

/s/ Kimberly W. Bojko  
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**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Complaint of Interstate Gas     )  
Supply, Inc., d/b/a IGS Energy, v. Santanna     )  
Natural Gas Corporation, d/b/a Santanna     ) Case No. 19-362-GE-CSS  
Energy Services, for Actions in Violation of the     )  
Ohio Revised and Administrative Codes.     )

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**MEMORANDUM IN SUPPORT**

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Santanna hereby respectfully requests that confidential treatment be given to the information attached to its application for certification to provide competitive retail electric services, which it has designated as confidential. The information for which protection from public disclosure is sought concerns the names and other personal information of customers who are referenced in discovery requests attached to Santanna's Motion for a Protective Order against IGS in order to comply with the Commission's rules concerning the disclosure of customer information.<sup>1</sup>

Ohio Adm. Code 4901-1-24(D) provides that the the Commission or certain designated Commission employees "may issue any order which is necessary to protect the confidentiality of information contained in the document, to the extent that state or federal law prohibits release of the information." Under Ohio Adm. Code 4901:1-29-09(A), the Commission has determined that customer names and personal information should not be disclosed. On May 15, 2019, the Commission granted Interstate Gas Supply, Inc., d/b/a IGS Energy's (IGS) Motion for a Waiver for certain requirements under Ohio Adm. Code

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<sup>1</sup> See Ohio Adm. Code 4901:1-29-09(A).

4901:1-29-09(A) in order to allow IGS and Santanna to exchange customer information covered by that rule for purposes of resolving the matters at issue in this proceeding.<sup>2</sup>

In granting the waiver to allow the exchange of customer information, however, the Commission noted that such information could only be exchanged pursuant to a protective agreement between the parties.<sup>3</sup> As information disclosed in discovery requests between the parties pursuant to the Commission's Entry granting a waiver is now relevant to Santanna's Motion for Protective Order against IGS, Santanna is seeking this protective order in order to allow the Commission to review those discovery requests without violating Ohio Adm. Code 4901:1-29-09 or the conditions imposed by the Commission in granting the waiver allowing the exchange of customer information.

In order to comply with Ohio Adm. Code 4901-1-24(D)(1)'s requirement that only such information be redacted as is necessary to prevent disclosure of the allegedly confidential information, Santanna has only redacted from Attachments A, B, and C the information necessary to prevent disclosure of customer names or personal information. All other information contained in the attachments, including the non-confidential portions of discovery requests that include customer names and personal information has been filed in the public docket.

Accordingly, for the reasons specified herein, Santanna respectfully requests that the Commission grant this motion for a protective order and maintain Attachments A, B, and C to Santanna's Motion for Protective Order against IGS in confidential form in order to prevent the public disclosure of confidential customer information.

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<sup>2</sup> See Entry at ¶ 15 (May 15, 2019).

<sup>3</sup> Id. at ¶ 13.

Respectfully submitted,

/s/ Kimberly W. Bojko

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing was served on July 30, 2019 by electronic mail upon all parties of record.

/s/ Kimberly W. Bojko  
Kimberly W. Bojko