

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Commission's Review     )  
of the Minimum Gas Service Standards in     )  
Chapter 4901:1-13 of the Ohio                 )  
Administrative Code.                             )     Case No. 19-1429-GA-ORD

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

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PUCO

Bethany Allen (0093732)  
Email: bethany.allen@igs.com  
Joseph Olikar (0086088)  
Email: joe.oliker@igs.com  
Michael Nugent (0090408)  
Email: michael.nugent@igs.com  
IGS Energy  
6100 Emerald Parkway  
Dublin, Ohio 43016  
Telephone: (614) 659-5000

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**MOTION FOR PROTECTIVE ORDER**

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Pursuant to the provisions of Ohio Adm.Code 4901-1-24, Interstate Gas Supply, Inc. ("IGS" or "IGS Energy") requests that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of portions of the Initial Comments of Interstate Gas Supply, Inc., including the attached Affidavit of Ron Waterman. Specifically, IGS requests protective treatment with respect to the portion of comments noted on Pages 2-10 and in the Affidavit for the reasons set forth in the attached Memorandum in Support.

Respectfully,

/s/Bethany Allen  
Bethany Allen (0093732)  
Email: bethany.allen@igs.com  
IGS Energy  
6100 Emerald Parkway  
Dublin, Ohio 43016  
Telephone: (614) 659-5000

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**MEMORANDUM IN SUPPORT**

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Accompanying this Motion, IGS has filed the Initial Comments of Interstate Gas Supply, Inc., including the Affidavit of Ron Waterman, in a redacted form and in an *unredacted form under seal in this proceeding*. By this Motion, IGS requests confidential treatment of the unredacted portions filed under seal.

Ohio law and the Commission's rules provide for the protection of confidential and proprietary information. Specifically, Ohio Adm.Code 4901-1-24(A) provides the Commission may issue:

[A]ny order which is necessary to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense. Such a protective order may provide that: . . . (7) A trade secret or other confidential research, development, commercial, or other information not be disclosed or be disclosed only in a designated way.

Pursuant to Ohio Adm.Code 4901-1-24(D), the Commission also may issue an order to protect the confidentiality of information contained in documents filed with the Commission to the extent that state or federal law prohibits the release of the information and where non-disclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code.

Ohio law defines a trade secret as "information \* \* \* that satisfies both of the following: (1) It derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. (2) It is the subject of efforts that are reasonable under the circumstances to maintain its secrecy." R.C. 1333.61(D).

The redacted information in the Initial Comments of Interstate Gas Supply, Inc. and the Affidavit of Ron Waterman contains proprietary business data that should be considered confidential trade secret information. If the redacted information was to be made available in the open marketplace, IGS could suffer real harm and a competitive disadvantage.

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

Respectfully,

/s/Bethany Allen  
Bethany Allen (0093732)  
Email: bethany.allen@igs.com  
IGS Energy  
6100 Emerald Parkway  
Dublin, Ohio 43016  
Telephone: (614) 659-5000