

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Duke)
Energy Ohio, Inc. for Approval of McMann) Case No. 19-2223-EL-UNC
Battery Storage Project.)

MOTION FOR PROTECTIVE ORDER OF
INTERSTATE GAS SUPPLY, INC.

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PUCO

Pursuant to Ohio Adm. Code 4901-1-02, 4901-1-12, and 4901-1-24(D), Interstate Gas Supply, Inc. ("IGS Energy" or "IGS") moves the Public Utilities Commission of Ohio ("PUCO") for a protective order regarding information asserted to be confidential by Duke Energy Ohio, Inc. ("Duke"). As part of discovery in this proceeding, Duke provided certain financial projections to IGS. Duke shared that information subject to a protective agreement, and Duke asserts that the information provided is confidential.

IGS hereby requests that, in accordance with Ohio Adm. Code 4901-1-24, the PUCO issue such order as necessary to protect the undisclosed (i.e. redacted) portions of IGS' Comments that are asserted to be confidential by Duke. IGS is filing its Comments under seal, and in accordance with the procedure set forth by the PUCO pursuant to its May 5, 2020 Entry in Case No. 20-591-AU-UNC. IGS is also filing a public version of its Comments that shows all information not claimed by Duke to be confidential.

By filing this motion, IGS does not concede that the undisclosed information is deserving of protective treatment; however, IGS acknowledges that it has obtained this information pursuant to a protective agreement with Duke that provides for the confidential and protective treatment of certain responses.

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The grounds for this Motion are more fully described in the accompanying Memorandum in Support.

Respectfully submitted,

/s/ Michael Nugent

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MEMORANDUM IN SUPPORT

IGS files this Motion for Protective Order (“Motion”) contemporaneously with the filing of its Comments in the above-captioned proceeding. In filing this Motion, IGS does not concede that the undisclosed information in its Comments and/or corresponding attachments deserves protection from public disclosure under Ohio Adm. Code 4901-1-24(D).

This filing for protection is based on claims asserted by Duke. Duke considers the undisclosed information to be confidential, as marked on their discovery responses, and therefore, deserving of protection. Because of this confidential designation, IGS wishes to keep such information protected. Specifically, IGS seeks to preserve the confidentiality of certain undisclosed information included on the following pages of its Comments and/or related attachments:

- **IGS’ Comments**
 - Page 13
 - Pages 15-16
 - Pages 18-20

- **IGS’ Attachment A**
 - Pages 3-6
 - Pages 31-37

- **IGS’ Attachment C**
 - Pages 2-15

In addition, IGS is filing a public version of its Comments so that all information not marked as confidential by Duke is accessible for public review. For the foregoing reasons, IGS respectfully requests that the Public Utilities Commission of Ohio grant its Motion.

Respectfully submitted,

/s/ Michael Nugent

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CERTIFICATE OF SERVICE

I certify that this *Motion for Protective Order and Memorandum in Support of Interstate Gas Supply, Inc.* was filed electronically with the Docketing Division of the Public Utilities Commission of Ohio on this 19th day of May 2020.

/s/ Michael Nugent
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