

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The)	
Dayton Power and Light Company for a)	
Finding That Its Current Electric Security)	
Plan Passes the Significantly Excessive)	Case No. 20-0680-EL-UNC
Earnings Test and More Favorable in the)	
Aggregate Test in R.C. 4928.143(E).)	

**MOTION FOR PROTECTIVE ORDER AND EXTENSION OF FILING TIME FOR
CONFIDENTIAL VERSION OF COMMENTS AND MEMORANDUM IN SUPPORT
OF INTERSTATE GAS SUPPLY, INC.**

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

Frank P. Darr (0025469)
fdarr2019@gmail.com
6800 Linbrook Blvd.
Columbus, Ohio 43235
Telephone: (614) 390-6750

Attorneys for IGS
(willing to accept service via email)

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Case No. 20-0680-EL-UNC

**MOTION FOR PROTECTIVE ORDER AND EXTENSION OF FILING TIME FOR
CONFIDENTIAL VERSION OF COMMENTS OF INTERSTATE GAS SUPPLY, INC.**

Interstate Gas Supply, Inc. ("IGS") respectfully requests, in accordance with Ohio Adm.Code 4901-1-24, that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of the Initial Comments of Interstate Gas Supply, Inc. ("Initial Comments") filed on July 1, 2020, in this proceeding for the reasons set forth in the attached Memorandum in Support. Additionally, IGS moves for an order that accepts as timely filed the confidential version of the Initial Comments mailed to the Commission on July 1, 2020.

Respectfully submitted,

/s/ Bethany Allen
Bethany Allen (0093732)
Counsel of Record
bethany.allen@igs.com
Joseph Olikier (0086088)
joe.oliker@igs.com
Michael Nugent (0090408)
michael.nugent@igs.com
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MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, IGS has filed its Initial Comments in a redacted form and posted those Comments to the Commission in an unredacted form under seal. By this Motion, IGS requests confidential treatment of the unredacted portions filed under seal. The Dayton Power & Light Company ("DP&L") has designated information contained in these portions of the Initial Comments as confidential and competitively sensitive and produced the information subject to a protective agreement between DP&L and IGS. IGS takes no position as to whether the information is a confidential trade secret under Ohio law, but files the Motion for Protective Order and Memorandum in Support pursuant to a protective agreement executed by IGS and DP&L.

Additionally, IGS moves for an order that accepts as timely filed the confidential version of the Initial Comments mailed to the Commission on July 1, 2020. This motion is necessary because the Commission currently is not permitting in-person or electronic filing of materials containing confidential materials and instead is requiring parties to submit these materials to it by mail. *In the Matter of the Proper Procedures and Process for the Commission's Operations and Proceedings During the Declared State of Emergency*, Case No. 20-591-AU-UNC, Entry (May 4, 2020). To provide timely

distribution of its Initial Comments, IGS with the agreement of DP&L provided an electronic version of the unredacted Initial Comments to DP&L and informed parties to seek a copy of the Initial Comments from counsel for DP&L. Based on these steps to assure that no party is prejudiced, IGS requests that the unredacted version of its Initial Comments be deemed timely upon receipt by the Commission.

Respectfully submitted,

/s/Bethany Allen

Bethany Allen (0093732)

Counsel of Record

bethany.allen@igs.com

Joseph Olikier (0086088)

joe.oliker@igs.com

Michael Nugent (0090408)

michael.nugent@igs.com

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Telephone: (614) 659-5000

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6800 Linbrook Blvd.

Columbus, Ohio 43235

Telephone: (614) 390-6750

Attorneys for IGS

(willing to accept service via email)

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 July 1, 2020. The Commission's e-filing system will electronically serve notice of the filing of this document on the parties subscribed to this proceeding. Additionally, notice was provided to the parties listed below.

/s/ Bethany Allen

Bethany Allen

christopher.healey@occ.ohio.gov
william.michael@occ.ohio.gov
amy.botschner.obrien@occ.ohio.gov
jsharkey@ficlaw.com
djieland@ficlaw.com
chollon@ficlaw.com
michael.schuler@aes.com
mkurtz@bkllawfirm.com
kboehm@bkllawfirm.com
jklercohn@bkllawfirm.com
dparram@bricker.com
dstinson@bricker.com
jspottswood@bricker.com
slesser@calfee.com
tallexander@calfee.com
mkeaney@calfee.com
khehmeyer@calfee.com
mpritchard@mcneeslaw.com
rglover@mcneeslaw.com
Stephanie.Chmiel@ThompsonHine.com
Kevin.Oles@ThompsonHine.com
paul@carpenterlipps.com
thomas.lindgren@ohioattorneygeneral.gov

Attorney Examiners:

patricia.schabo@puco.ohio.gov
michael.williams@puco.ohio.gov

This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 20-0680-EL-UNC

Summary: Motion Motion for Protective Order and Extension of Filing Time for Confidential Version of Comments of Interstate Gas Supply, Inc. electronically filed by Bethany Allen on behalf of Interstate Gas Supply, Inc.