

**BEFORE THE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of The Dayton)
Power and Light Company for A Finding That) Case No. 20-680-EL-UNC
Its Current Electric Security Plan Passes The)
Significantly Excessive Earnings Test And)
More Favorable In The Aggregate Test In R.C.)
4928.143(E))

**HONDA OF AMERICA MFG., INC. AND THE CITY OF DAYTON'S
MOTION FOR PROTECTIVE ORDER**

The City of Dayton and Honda of America Mfg., Inc. (collectively, "Joint Movants") respectfully move pursuant to O.A.C. 4901-1-24 for a protective order keeping confidential certain information included in the Initial Comments of Joint Movants filed on July 1, 2020, in this docket for the reasons more fully set forth in the attached Memorandum in Support. Additionally, Joint Movants move for an order that accepts as timely the confidential version of the Initial Comments mailed to the Commission on July 1, 2020.

Respectfully submitted,

/s/ N. Trevor Alexander

Steven D. Lesser (20242)

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The City of Dayton*

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**MEMORANDUM IN SUPPORT OF
HONDA OF AMERICA MFG., INC. AND THE CITY OF DAYTON'S MOTION FOR
PROTECTIVE ORDER**

Contemporaneous with this Motion, the City of Dayton and Honda of America Mfg., Inc. (collectively, "Joint Movants") electronically filed a public, redacted version of its Initial Comments, and sent a confidential, unredacted version of its Initial Comments to the Public Utilities Commission of Ohio ("Commission") pursuant to the directive issued in the Attorney Examiner's Entry (May 5, 2020) in Case No. 20-591-AU-UNC. The Dayton Power and Light Company ("DP&L") has designated information contained in these portions of the Initial Comments as confidential and competitively sensitive, and DP&L produced the information subject to a protective agreement between DP&L and Joint Movants. Joint Movants take no position as to whether the information marked as confidential is a confidential trade secret under Ohio law; nevertheless, Joint Movants file the Motion for Protective Order and Memorandum in Support pursuant to a protective agreement executed by DP&L and Joint Movants.

Additionally, Joint Movants move for an order that accepts as timely filed the confidential version of the Initial Comments mailed to the Commission on July 1, 2020. Joint Movants are required to send the confidential materials via regular mail to the Commission per the Attorney Examiner's Entry (May 5, 2020) in Case No. 20-591-AU-UNC. Accordingly, for

the foregoing reasons, Joint Movants seek a protective order preventing public disclosure of the information designated as confidential in the Initial Comments, as well as an order from the Commission that accepts as timely the confidential version of the Initial Comments mailed to the Commission on July 1, 2020.

Respectfully submitted,

/s/ N. Trevor Alexander

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CERTIFICATE OF SERVICE

I certify that the foregoing was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 1st day of July, 2020. The PUCO's e-filing system will electronically serve notice of the filing of this document on counsel for all parties.

/s/ Mark T. Keaney
One of the Attorneys for the City of Dayton
and Honda of America Mfg., Inc.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

7/1/2020 5:05:23 PM

in

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

Summary: Motion Motion for Protective Order and Memorandum in Support of The City of Dayton and Honda of America Mfg., Inc. electronically filed by Mr. Mark T Keaney on behalf of Honda of America Mfg., Inc. and City of Dayton