

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of	)	
Dayton Power & Light Company that its	)	
Current Electric Security Plan Passes the	)	Case No. 20-680-EL-UNC
Significantly Excessive Earnings Test and	)	
More Favorable in the Aggregate Test in	)	
R.C. 4928.143(E).	)	

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**MOTION OF INDUSTRIAL ENERGY USERS-OHIO  
FOR PROTECTIVE ORDER  
AND MEMORANDUM IN SUPPORT**

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**JULY 1, 2020**

**COUNSEL FOR INDUSTRIAL ENERGY USERS-  
OHIO**

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**MOTION OF INDUSTRIAL ENERGY USERS-OHIO  
FOR PROTECTIVE ORDER**

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Pursuant to the provisions of Rule 4901-1-24(D), Ohio Administrative Code ("O.A.C."), the Industrial Energy Users-Ohio ("IEU-Ohio") respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of the Comments of IEU-Ohio filed on July 1, 2020, in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Rebekah J. Glover

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**MEMORANDUM IN SUPPORT**

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Contemporaneous with this Motion, IEU-Ohio has filed its Comments in this proceeding in a redacted form and in an unredacted form under seal. By this Motion, IEU-Ohio 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 Comments as confidential and competitively sensitive and produced the information subject to a protective agreement between DP&L and IEU-Ohio. IEU-Ohio takes no position as to whether the information is a confidential trade secret under Ohio law, but files this Motion for Protective Order and Memorandum in Support pursuant to a protective agreement executed by IEU-Ohio and DP&L.

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

Respectfully submitted,

/s/ Rebekah J. Glover

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Counsel of Record

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**COUNSEL FOR INDUSTRIAL ENERGY USERS-OHIO**

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Motion of Industrial Energy Users-Ohio for Protective Order and Memorandum in Support* was served upon the following parties of record this 1st day of July 2020, via electronic transmission, hand-delivery or first class mail, postage prepaid.

/s/ Rebekah J. Glover

Rebekah J. Glover

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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/1/2020 5:17:19 PM**

**in**

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

Summary: Motion for Protective Order and Memorandum in Support electronically filed by Ms. Rebekah J. Glover on behalf of Industrial Energy Users-Ohio