

**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).	)	

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

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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 Reply Comments of Interstate Gas Supply, Inc. ("Reply Comments") filed on July 16, 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 Reply Comments mailed to the Commission on July 16, 2020.

Respectfully submitted,

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**MEMORANDUM IN SUPPORT**

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Contemporaneous with this Motion, IGS has filed its Reply 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 Reply 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 Reply Comments mailed to the Commission on July 16, 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 Reply Comments, IGS with the agreement of DP&L provided an electronic version of the unredacted Reply Comments to DP&L and informed parties to seek a copy of the Reply 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 Reply Comments be deemed timely upon receipt by the Commission.

Respectfully submitted,

/s/Bethany Allen

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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 July 16, 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

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

**Commission of Ohio Docketing Information System on**

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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 and Memorandum in Support of Interstate Gas Supply, Inc. electronically filed by Bethany Allen on behalf of Interstate Gas Supply, Inc.