

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Procurement of	:	
Natural Gas Supply for the Standard	:	
Choice Offer Customers of Columbia	:	Case No. 22-121-GA-UNC
Gas of Ohio, Inc.	:	
	:	

MOTION FOR A PROTECTIVE ORDER
SUBMITTED ON BEHALF OF THE STAFF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO

The Staff of the Public Utilities Commission of Ohio (Staff) hereby requests that the names of the participating bidders in the recent auction for natural gas supplies be kept confidential for fifteen days pursuant to Ohio Adm.Code 4901-1-24. The accompanying memorandum in support sets forth the grounds for this motion.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Thomas M. Shepherd

Thomas M. Shepherd

Thomas G. Lindgren

Assistant Attorneys General

Public Utilities Section

30 East Broad Street, 26th Floor

Columbus, OH 43215-3793

614.644.8539 (telephone)

614.557.0984 (fax)

Thomas.Shepherd@OhioAGO.gov

Thomas.Lindgren@OhioAGO.gov

On Behalf of the Staff of
The Public Utilities Commission of Ohio

MEMORANDUM IN SUPPORT

On January 25, 2022, an auction was held to procure natural gas supplies for Standard Choice Offer (SCO) customers of Columbia Gas of Ohio, Inc. (Columbia). On the same date, the Staff filed a report concerning the results of the auction. In this report, Staff does not disclose the names of the participating and winning bidders.

Staff requests that the names of the participating and winning bidders be kept confidential for a period of fifteen days. This is necessary in order to protect the bidders' positions in negotiations with pipelines for the incremental capacity necessary to meet their obligations to deliver gas if chosen as a supplier. This information warrants protection as a trade secret because immediate release of this information would cause serious economic harm to the auction participants. Therefore, the Commission should grant a protective order keeping this information under seal for a period of fifteen days.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Thomas M. Shepherd

Thomas M. Shepherd
Thomas G. Lindgren
Assistant Attorneys General
Public Utilities Section
30 East Broad Street, 26th Floor
Columbus, OH 43215-3793
614.644.8539 (telephone)
614.557.0984 (fax)
Thomas.Shepherd@OhioAGO.gov
Thomas.Lindgren@OhioAGO.gov

On Behalf of the Staff of
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PROOF OF SERVICE

I hereby certify that a true copy of the foregoing **Motion for Protective Order** submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served by regular U.S. mail, postage prepaid, or by electronic service, upon the following Parties of Record, this 25th day of January, 2022.

/s/ Thomas M. Shepherd

Thomas M. Shepherd

Assistant Attorney General

Parties of Record:

John R. Ryan

NiSource Corporate Services Company

290 W. Nationwide Blvd.

Columbus, OH 43215

JohnRyan@nisource.com

Counsel for Columbia Gas of Ohio

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Summary: Motion for a Protective Order Submitted on Behalf of the Staff of the
Public Utilities Commission of Ohio electronically filed by Mrs. Kimberly M. Naeder
on behalf of PUCO