

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Co-)	
Columbia Gas of Ohio, Inc. for Authority)	
to Amend its Filed Tariffs to Increase the)	Case No. 21-637-GA-AIR
Rates and Charges for Gas Services and)	
Related Matters.)	

In the Matter of the Application of Co-)	
Columbia Gas of Ohio, Inc. for Approval of)	Case No. 21-638-GA-ALT
an Alternative Form of Regulation.)	

In the Matter of the Application of Co-)	
Columbia Gas of Ohio, Inc. for Approval of)	
a Demand Side Management Program)	Case No. 21-639-GA-UNC
for its Residential and Commercial Cus-)	
tomers.)	

In the Matter of the Application of Co-)	
Columbia Gas of Ohio, Inc. for Approval to)	Case No. 21-640-GA-AAM
Change Accounting Methods.)	

**THIRD MOTION FOR PROTECTIVE ORDER
OF COLUMBIA GAS OF OHIO, INC.**

On July 14, 2021, Columbia Gas of Ohio, Inc. (“Columbia”) filed a Motion for Protective Order requesting protective treatment of certain confidential or highly confidential information contained in the testimony filed in support of its Application. Pursuant to Ohio Adm.Code 4901-1-24(D), Columbia now hereby requests protective treatment for certain confidential or highly confidential information contained in the supplemental testimony filed on May 13, 2022, in support of Columbia’s Application. The information Columbia seeks to protect from disclosure is confidential and contains proprietary trade secrets that are subject to protection from disclosure under Ohio law. The reasons for this motion are more fully explained in the attached Memorandum in Support.

Respectfully submitted,

/s/ Joseph M. Clark

Joseph M. Clark, Asst. Gen. Counsel
(0080711) (Counsel of Record)

John R. Ryan, Sr. Counsel (0090607)

P.O. Box 117

290 W. Nationwide Blvd.

Columbus, Ohio 43216-0117

Telephone: (614) 813-8685

(614) 285-2220

E-mail: josephclark@nisource.com

johnryan@nisource.com

Eric B. Gallon (0071465)

Mark S. Stemm (0023146)

L. Bradfield Hughes (0070997)

Devan K. Flahive (0097457)

Porter, Wright, Morris & Arthur LLP

41 South High Street

Columbus, OH 43215

Telephone: (614) 227-2000

Email: egallon@porterwright.com

mstemm@porterwright.com

bhughes@porterwright.com

dflahive@porterwright.com

(Willing to accept service by e-mail)

Attorneys for

COLUMBIA GAS OF OHIO, INC.

MEMORANDUM IN SUPPORT

1. Introduction

On June 30, 2021, Columbia filed an application to change its distribution rates, modify its rate class structure, make various other changes to its tariffs and accounting methods, recover approved cost deferrals since the last rate case, and adopt new riders. Columbia's Application requested approval of an alternative rate plan, under which Columbia is seeking to continue its existing Infrastructure Replacement Program and Capital Expenditure Program and their associated riders and implement a new Federally Mandated Rider to recover incremental costs associated with federally and state-mandated investments in plant, including investments to comply with the Pipeline and Hazardous Materials Safety Administration "Mega Rule." Columbia's Application also requested authority to continue its successful demand side management ("DSM") Program. On April 6, Commission Staff filed its Staff Report in response to Columbia's Application. On May 6, Columbia filed its objections to the Staff Report, and the intervenors filed their objections to the Staff Report and to Columbia's Application.

Simultaneous with this filing, on May 13, 2022, Columbia is filing supplemental direct testimony from numerous witnesses in support of its Application. Portions of the following pre-filed testimony, or of attachments to that testimony, is confidential and proprietary information entitled to protection under Ohio Adm.Code 4901-1-24:

Witness	Reference for Confidential Information	Description of Confidential Information
Russell Feingold	Attachment RAF-1-S and Attachment RAF-7-S	Revenue and rate information related to the Company's Flex customers
Marc Okin	Prepared Supplemental Direct Testimony at pp. 7-8; Attachments MBO-1-S, MBO-3-S, MBO-4-S, MBO-5-S, MBO-8-S, and MBO-10-S	Insurance settlement agreements; records showing environmental spend; information on legal expenses; settlement agreement with FirstEnergy; NiSource's 2021 MGP cost model report

Tami Shaeffer	Attachments TLS-10-S, TLS-11-S, and TLS-12-S	Employee payroll information, including salaries and incentive compensation; budgeted, and affiliate, employee benefits actuarial studies; affiliate corporate insurance information
Kimberly Cartella	Attachment KKC-6-S	Employee payroll information, including salaries and incentive compensation
Melissa Thompson	Attachments MLT-3-S, MLT-4-S, MLT-5-S, MLT-6-S, MLT-7-S, MLT-10-S, and MLT-S-11	Individual customer-specific information related to riser replacements; agreements related to transfer of assets to Columbia; GIS system information on segments of North Columbus High Pressure system as well as facilities in Berea

For the reasons described below, Columbia requests that the Commission grant this Motion for Protective Order and protect from public disclosure Columbia's trade secrets contained in the listed supplemental direct testimony and testimony attachments.

2. Background Law

The need to protect confidential and proprietary information is recognized under the Commission's rules. Ohio Adm.Code 4901-1-24 provides:

Upon motion of any party or person with regard to the filing of a document with the commission's docketing division relative to a case before the commission * * * the attorney examiner may issue any order which is necessary to protect the confidentiality of information contained in the document, to the extent that state or federal law prohibits release of the information, including where the information is

deemed by * * * the attorney examiner to constitute a trade secret under Ohio law, and where nondisclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code.

Furthermore, under the Ohio Uniform Trade Secrets Act, a “Trade Secret” is defined as:

(D) *** information, including the whole or any portion or phase of any scientific or technical information, design, process, procedure, formula, pattern, compilation, program, device, method, technique, or improvement, or any business information or plans, financial information, or listing of names, addresses, or telephone numbers, that satisfies both of the following:

- (1) It derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.
- (2) It is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.

R.C. 1333.61(D). This definition clearly reflects the state policy favoring the protection of trade secrets such as the business information reflected in these discovery requests. *See Al Minor & Assocs. v. Martin*, 117 Ohio St. 3d 58, 63 (2008) (Supreme Court of Ohio noting that “by adopting the Uniform Trade Secrets Act, the General Assembly has determined that public policy in Ohio, as in the majority of other jurisdictions, favors the protection of trade secrets, whether memorized or reduced to some tangible form.”)

Moreover, in *State ex rel The Plain Dealer v. the Ohio Dept. of Ins.* (1997),¹ the Supreme Court of Ohio adopted a six-factor test to analyze whether information is a trade secret under the statute: (1) the extent to which the information is known outside the business, (2) the extent to which it is known to those inside the business, i.e., by the employees, (3) the precautions taken by the holder of the trade secret to guard the secrecy of the information, (4) the savings effected and the value to the holder in having the information as against competitors, (5) the

¹ *State ex rel The Plain Dealer v. the Ohio Dept. of Ins.*, 80 Ohio St. 3d 513 (1997).

amount of effort or money expended in obtaining and developing the information, and (6) the amount of time and expense it would take for others to acquire and duplicate the information.² Ohio state courts and federal courts applying Ohio law continue to apply this six-factor test. *See, e.g., RECO Equip., Inc. v. Wilson*, S.D. Ohio No. 2:20-cv-3556, 2020 U.S. Dist. LEXIS 218410, at *38 (applying Ohio’s six-factor test and concluding that plaintiff made sufficient showing for trade-secret status of stored data regarding manner in which it services customers, makes repairs, and documents customer experiences).

Applying these criteria, the Commission routinely grants protection to confidential, trade secret information, including pricing information.³ For example, in connection with Columbia’s application for approval to continue its DSM programs, the Commission confirmed that information pertaining to Columbia’s incentives and rebates, cost-effectiveness model, and the model’s associated inputs and data were appropriately shielded from public disclosure as trade secrets.⁴

3. Argument

3.1. Russell Feingold

Attachment RAF-1-S to the supplemental direct testimony of Russell Feingold provides details of Columbia’s class revenue apportionment process, together with the computational details supporting Columbia’s proposed rate design for each rate class. This attachment includes information taken from Attachment RAF-7-S to the supplemental direct testimony of Russell Feingold, which is an updated Schedule E-4. The original Schedule E-4 was the subject of Columbia’s first Motion for Protective Order, filed June 30, 2021.

As explained in Columbia’s first Motion for Protective Order, some customers’ rates are “flexed” under provisions of Columbia’s tariff that allow Columbia to agree to a “charge lower than the [applicable] maximum delivery charge” where

² *Id.* at 524-525 (quoting *Pyromatics, Inc. v. Petruziello*, 7 Ohio App. 3d 131, 134-135 (Cuyahoga County 1983)).

³ *See, e.g. In the Matter of the Application of Columbia Gas of Ohio, Inc., for Approval of a Reasonable Arrangement for Transporting Natural Gas*, Case No. 16-1555-GA-AEC, Finding and Order (August 31, 2016).

⁴ *In the Matter of the Application of Columbia Gas of Ohio, Inc. for Approval of Demand-Side Management Programs for its Residential and Commercial Customers*, Case No. 16-1309-GA-UNC, Second Entry on Rehearing at ¶ 75 (April 10, 2019).

“necessary because of competition from a pipeline, distribution system or non[natural gas fuel source * * * .”⁵ The “Flex” rates to which Columbia has agreed for some customers in its General Transportation Service (GTS), Large General Transportation Service (LGTS), and Full Requirements Cooperative Transportation Service (FRCTS) rate classes are not publicly known and cannot be ascertained using public information. Schedule E-4 presents a summary of Columbia’s annualized test year revenues at proposed rates as compared to Columbia’s most current rates for all rate schedules. This summary includes customers whose rates are “flexed” under Columbia’s tariff.

Columbia takes reasonable efforts to maintain the secrecy of its Customers’ Flex rates, such as including confidentiality provisions in its Flex agreements with customers, not sharing the Flex rates with employees who do not need to know that information to perform their job functions, and not sharing the Flex rates outside the Company except with contractors who need to know those rates to perform their responsibilities for the Company. If the customer bill counts and consumption volumes for “Flex” customers in Attachments RAF-1-S and RAF-7-S were made public, customers could determine the average Flex rate for their rate schedule, and some existing Flex customers could attempt to negotiate lower rates. This could ultimately increase Columbia’s revenue requirement. Additionally, publicly disclosing this information could allow competitors of Flex rate customers to see and/or calculate competitively sensitive billing information or amounts, and give those competitors valuable competitively sensitive information about

⁵ See P.U.C.O. No. 2, Ninth Revised Sheet No. 16 (Small General Sales Rate), Eighth Revised Sheet No. 17, page 1 of 2 (Small General Schools Sales Rate), Eighth Revised Sheet No. 18 (General Sales Rate), Seventh Revised Sheet No. 19 (General Schools Sales Rate), Fifth Revised Sheet No. 20 (Large General Sales Rate), Seventh Revised Sheet No. 49 (Small General Transportation Service Delivery Charge), Eighth Revised Sheet No. 50 (Small General Schools Transportation Service Delivery Charge), Eighth Revised Sheet No. 53 (General Transportation Service Delivery Charge), Sixth Revised Sheet No. 54 (General Schools Transportation Service Delivery Charge), Third Revised Sheet No. 58 (Large General Transportation Service), Section VII, Seventh Revised Sheet No. 25, pages 2 and 3 of 3 (Full Requirements Small General Transportation Service and Full Requirements Small General Transportation Service), Section VII, Eighth Revised Sheet No. 27, page 2 of 3 (Full Requirements General Transportation Service Delivery Charge), Section VII, Sixth Revised Sheet No. 27, page 3 of 3 (Full Requirements General Schools Transportation Service Delivery Charge), Section VII, Ninth Revised Sheet No. 28, page 2 of 3 (Full Requirements Large General Transportation Service). *See also* Section VII, Fourth Revised Sheet No. 41 (Full Requirements Cooperative Transportation Service) (allowing Columbia to “bill less than maximum rate where competitive circumstances exist”).

those Flex rate customers. Finally, disclosing the Flex rates will provide Columbia's competitors a competitive advantage to try to negotiate lower rates with these customers, which could also increase Columbia's revenue requirement.

Consequently, the "Adjusted Bills" and "Adjusted Volumes" information for Flex customers on pages 1 of 10 and 2 of 10 in Attachment RAF-1-S, and the "Bills" and "MCF" information for Flex customers on pages 8 of 10, 9 of 10, and 10 of 10, in Attachment RAF-1-S, is confidential, trade secret information and entitled to protection under Title 49, the Commission's rules, and Commission precedent.

Similarly, the "Customer Bills" and "Sales" information for Flex customers on pages 1 of 4, 2 of 4, 3 of 4, and 4 of 4 in Attachment RAF-7-S is confidential, trade secret information and entitled to protection under Title 49, the Commission's rules, and Commission precedent.

3.2. Marc Okin

CONFIDENTIAL Attachment MBO-1-S to Mr. Okin's supplemental testimony is a compilation of thirteen insurance settlements resolving Columbia's coverage claims for environmental remediation costs at properties owned by Columbia's predecessors. Each of the insurance settlements contains a clause requiring Columbia to keep the settlements confidential. CONFIDENTIAL Attachment MBO-5-S summarizes terms from the confidential settlements.

Columbia seeks a protective order against public disclosure of these settlement agreements. Ohio Adm.Code 4901-1-24(D) authorizes granting confidential protection in this scenario and such an Order would not be inconsistent with the purposes of Title 49. Respecting the parties' confidentiality provisions will encourage other utilities to reach private agreements to resolve insurance claims.

CONFIDENTIAL Attachment MBO-3-S displays Columbia's confidential internal data on the locations and costs of environmental remediation for addressing PCB, UST, Asbestos, Mercury, and other contaminants at various non-MGP sites owned/operated by Columbia (such as offices, service centers and operating centers). Columbia takes reasonable efforts to maintain the confidentiality of this data to avoid unnecessary or less-than-complete disclosures of environmental remediation, depending on the circumstances.

CONFIDENTIAL Attachment MBO-4-S identifies individual legal invoices and breaks down confidential billing data to show the total legal cost Columbia incurred in connection with the insurance settlements.

At pages 7-8 of Mr. Okin's supplemental testimony, he discusses the terms of a 2008 settlement agreement with Toledo Edison that resolved environmental remediation responsibilities under the federal Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") regarding a former manufactured gas plant site (Toledo I (Land) MGP). The settlement agreement, which is attached to Mr. Okin's supplemental testimony as CONFIDENTIAL Attachment MBO-8-S, prohibits the parties from disclosing any term of the agreement, except as expressly provided therein. None of the exceptions to confidentiality permit Columbia to unilaterally disclose any term of the agreement on the public record. Mr. Okin discloses only those agreement terms necessary to inform the Commission of the site's history, of Columbia's success in obtaining a financial contribution from Toledo Edison toward environmental remediation, and of the accounting treatment for the amount of environmental remediation expense Columbia seeks to recover for this site.

Columbia seeks a protective order against public disclosure of the agreement terms in Mr. Okin's testimony at p. 7, lines 23-24, and p. 8, line 26, and the agreement itself at CONFIDENTIAL Attachment MBO-8-S. Columbia also moves to redact the environmental remediation cost amount shown in Mr. Okin's supplemental testimony at p. 8, line 24, and Attachments MBO-3a and -3b, because the sum of those expenses can be used to easily calculate the amount of the confidential settlement payment which Columbia subtracted from the amount it seeks to recover.

Ohio Adm.Code 4901-1-24(D) authorizes granting confidential protection in this scenario and such an Order would not be inconsistent with the purposes of Title 49. Respecting the parties' confidentiality provisions will encourage other utilities to reach private agreements for environmental remediation. Moreover, the settlement agreement authorizes Columbia to disclose it to the Commission in connection with this proceeding.

CONFIDENTIAL Attachment MBO-10-S is a copy of the Ohio-relevant sections of NiSource's 2021 MGP Cost Model report. The MGP Cost Model report was prepared by consultant Haley & Aldrich to help Columbia develop reserve amounts for its future environmental remediation costs at the MGP sites. The methodology is proprietary and Columbia takes reasonable efforts to maintain its confidentiality.

3.3. Tami Shaeffer

Columbia witness has three confidential attachments to her supplemental direct testimony.

CONFIDENTIAL Attachment TLS-10-S provides the payroll support for the short-term incentive compensation that Columbia paid its active employees in February and March 2022. This attachment also contains the source payroll file, which includes employee's base salaries. Such information is maintained in strict confidence by Columbia and is neither shared with persons outside the company nor widely within the company. If released to the public, such information could be used by other public utilities (and other companies) to formulate competing incentive packages, in an attempt to attract Columbia employees.

CONFIDENTIAL Attachment TLS-11-S provides the details of actuarial studies prepared by Aon and Alight Solutions regarding the level of employee benefits O&M expense that will be experienced by Columbia and its affiliates beyond the test year. This Attachment was previously provided in response to CONFIDENTIAL Staff Request Set 1, No. 58. The Aon and Alight Solutions studies have not been shared with persons outside the company. If this level of detail regarding expected employee benefits O&M expense were released to the public, providers of employee benefits could use this information to formulate bids to offer their services to Columbia, thereby diminishing competition and potentially leading to higher costs for Columbia.

CONFIDENTIAL Attachment TLS-12-S provides providing documentation for the premiums and percentages of allocation to Columbia for its corporate insurance policies (including property insurance, workers compensation, medical stop-loss premiums, and other miscellaneous premiums). This Attachment was previously provided in response to CONFIDENTIAL Staff Request Set 1, No. 33. This information has not been shared outside the company. Again, if this level of detail regarding Columbia's insurance premiums were released to the public, providers of employee benefits could use this information to formulate bids to offer their services to Columbia, thereby diminishing competition and potentially leading to higher costs for Columbia.

Each of these documents is confidential, trade secret information and entitled to protection under Title 49, the Commission's rules, and Commission precedent.

3.4. Kimberly Cartella

CONFIDENTIAL Attachment KKC-6-S provides the payroll support for the hourly rate / base salary increase provided to Customer Service Representative employees effective on October 1, 2021. The Attachment includes personally iden-

tifying and wage information for personnel employed by Columbia. The information derives independent economic value, as if it is publicly disclosed, other employers competing for personnel in the same talent pool would derive a competitive advantage over Columbia. The Company has taken several steps to internally protect this information from accidental disclosure and this information is not known outside of Columbia/NiSource. The information constitutes business and financial information as well as a list of names that another entity would derive potential economic value from should it be provided access. Further, Columbia has expended its internal resources to obtain and develop this information and it would take a large amount of effort, time, and expense for another competitor to acquire and duplicate the information.

3.5. Melissa Thompson

CONFIDENTIAL Attachment MLT-3-S is a list of customer addresses where Columbia replaced the riser in January 2009, February 2010, and March 2010. Sensitive customer information, such as customer names, addresses, phone numbers, and PSIDs should be granted confidential treatment to avoid the public revelation of these customers' information. While certain parts of this compiled information might be available on the internet, such an aggregated compilation for thousands of Columbia's customers is not readily available. The list also provides a customer list (with contact information) to competitors of Columbia, who could then use the list to attempt to poach Columbia customer(s) if the competitor has facilities nearby. This information has economic value to Columbia's competitors, and keeping it confidential is reasonable under these circumstances. Additionally, this aggregated information is not available outside of Columbia, it is not distributed or available to employees except those who need to know, and it would take considerable time and expense for a competitor of Columbia to gather such information.

CONFIDENTIAL Attachments MLT-4-S through MLT-7-S contain the confidential and proprietary commercial terms under which Columbia acquired assets from former NiSource entities. These confidential terms include pricing, condition of assets, distribution of responsibilities, and identification of the assets to be transferred. These confidential commercial terms have independent economic value from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. Release of the terms in these agreements could give other entities insight into the value placed upon the assets by Columbia and could harm Columbia in

future negotiations with outside parties related to potential transfers of assets either to or from Columbia. Moreover, this information is not known outside the business, is only known inside the business to those who need to know, and these agreements are generally held within the legal department. While the value to Columbia is hard to quantify, a considerable amount of time went into the transaction underlying these agreements and it would take a very large amount of time and expense for others to acquire and duplicate the information.

CONFIDENTIAL Attachments MLT-10-S and MLT-11-S contain geographic information system (“GIS”) data for two sections of Columbia pipe, one in Columbus and one in Berea. This GIS data provides specific, sensitive information about Columbia’s facilities. Particularly, public release of this information would provide detailed information related to location, size, and pressure for high pressure (transmission) and medium pressure facilities. This information is protected by federal law as critical energy infrastructure information.⁶

4. Conclusion

For the reasons discussed above, the Commission should grant Columbia’s Motion for Protective Order and protect the listed confidential information from public disclosure. The Commission should order all parties to keep the listed information confidential and direct that any use of this information must be done under seal, pursuant to the Commission’s rules. Finally, pursuant to Ohio Adm.Code 4901-1-24(F), the Commission should deem the information confidential for a period of 24 months from the date of an order ruling on this Motion.

⁶ See R.C. 149.43(A)(1)(v).

/s/ Joseph M. Clark

Joseph M. Clark, Asst. Gen. Counsel
(0080711) (Counsel of Record)

John R. Ryan, Sr. Counsel (0090607)

P.O. Box 117

290 W. Nationwide Blvd.

Columbus, Ohio 43216-0117

Telephone: (614) 813-8685

(614) 285-2220

E-mail: josephclark@nisource.com

johnryan@nisource.com

Eric B. Gallon (0071465)

Mark S. Stemm (0023146)

L. Bradfield Hughes (0070997)

Devan K. Flahive (0097457)

Porter, Wright, Morris & Arthur LLP

41 South High Street

Columbus, Ohio 43215-6194

Telephone: (614) 227-2000

Email: egallon@porterwright.com

mstemm@porterwright.com

bhughes@porterwright.com

dflahive@porterwright.com

(Willing to accept service by e-mail)

Attorneys for

COLUMBIA GAS OF OHIO, INC.

CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served via electronic mail on the 13th day of May, 2022, upon the parties listed below.

/s/ Joseph M. Clark

Joseph M. Clark

Attorney for

COLUMBIA GAS OF OHIO, INC.

Citizens' Utility Board of Ohio	Trent Dougherty trent@hubaydougherty.com
Environmental Law & Policy Center	Janean R. Weber jweber@elpc.org
IEU-Ohio	Matthew R. Pritchard Bryce A. McKenney McNees Wallace & Nurick LLC mpritchard@mcneeslaw.com bmckenney@mcneeslaw.com
Interstate Gas Supply, Inc.	Michael Nugent Evan Betterton Joseph Olier michael.nugent@igs.com evan.betterton@igs.com joe.olier@igs.com
The Kroger Company	Angela Paul Whitfield Carpenter Lipps & Leland LLP paul@carpenterlipps.com

Northeast Ohio Public Energy Council	<p>Devin D. Parram BRICKER & ECKLER LLP dparram@bricker.com</p> <p>Glenn S. Krassen gkrassen@nopec.org</p>
Office of the Ohio Consumers' Counsel	<p>Angela D. O'Brien William J. Michael Assistant Consumers' Counsel angela.obrien@occ.ohio.gov william.michael@occ.ohio.gov</p>
Ohio Energy Group (OEG)	<p>Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Jody Kyler Cohn, Esq. BOEHM, KURTZ & LOWRY mkurtz@BKLawfirm.com kboehm@BKLawfirm.com jkylercohn@BKLawfirm.com</p>
Ohio Manufacturers' Association Energy Group	<p>Kimberly W. Bojko Jonathan Wygonski Carpenter Lipps & Leland LLP Bojko@carpenterlipps.com Wygonski@carpenterlipps.com</p>
Ohio Partners for Affordable Energy	<p>Robert Dove Kegler Brown Hill + Ritter Co., L.P.A. rdove@keglerbrown.com</p>
Ohio School Council	<p>Glenn S. Krassen BRICKER & ECKLER LLP gkrassen@bricker.com</p> <p>Dane Stinson BRICKER & ECKLER LLP dstinson@bricker.com</p>

Retail Energy Supply Association	Michael J. Settineri Gretchen L. Petrucci Vorys, Sater, Seymour and Pease LLP mjsettineri@vorys.com glpetrucci@vorys.com
---	---

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

5/13/2022 2:14:46 PM

in

Case No(s). 21-0637-GA-AIR, 21-0638-GA-ALT, 21-0639-GA-UNC, 21-0640-GA-AAM

Summary: Motion Third Motion for Protective Order of Columbia Gas of Ohio, Inc.
electronically filed by Ms. Melissa L. Thompson on behalf of Columbia Gas of Ohio,
Inc.