

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Aqua Ohio,)
Inc. to Increase Its Rates and Charges for Its) Case No. 22-1094-WW-AIR
Waterworks Service.)

In the Matter of the Application of Aqua Ohio)
Wastewater, Inc. to Increase Its Rates and) Case No. 22-1096-ST-AIR
Charges for its Waterworks Service.)

**JOINT MOTION FOR PROTECTIVE ORDER
SUBMITTED ON BEHALF OF
THE PUBLIC UTILITIES COMMISSION OF OHIO**

The Staff of the Public Utilities Commission of Ohio (Staff) and Aqua Ohio, Inc. and Aqua Ohio Wastewater, Inc. (collectively, Aqua), pursuant to Ohio Administrative Code (O.A.C) 4901-1-24, respectfully move the Public Utilities Commission of Ohio (Commission) for a protective order keeping confidential certain designated confidential information set forth in Larkin & Associates, PLLC (Larkin) and Acadian Consulting Group (Acadian) (collectively, Auditors) audit report. The audit report was filed in the dockets of these cases on July 13, 2023.

Grounds for this Motion are more particularly set forth in the accompanying Memorandum in Support.

Respectfully submitted,

Dave A. Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Rhiannon Howard

Rhiannon Howard (0099950)

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

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MEMORANDUM IN SUPPORT

On February 8, 2023, the Commission issued an Entry selecting Larkin to conduct the audit services necessary to assist the Commission with the rate increase application submitted by Aqua. On July 13, 2023, the Auditors and Staff filed the audit report in the docket. Simultaneously, Staff filed a Confidential Document Target Audit of the Application, which is the version of the audit report containing confidential information filed under seal.

Pursuant to O.A.C. § 4901-1-24(D), Staff and Aqua respectfully request that the Commission grant its motion for protective order keeping confidential certain designated confidential information set forth in the audit report. That which has been marked as confidential in the publicly shared audit report was deemed to contain confidential and proprietary business information by Aqua through data requests or informal conversations. The Auditors and Staff have a responsibility to maintain confidentiality of the information labeled as such by a utility and its responses to Staff.

For these reasons, Staff and Aqua request that the information designated in the confidential audit report be protected from public disclosure.

Respectfully submitted,

Dave A. Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Rhiannon Howard
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**On Behalf of the Staff of the
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**Attorneys for Aqua Ohio, Inc.
and Aqua Ohio Wastewater, Inc.**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **Joint Motion for Protective Order** was served via electronic mail or ordinary mail on the parties of record this 3rd day of October, 2023.

/s/ Rhiannon Howard
Rhiannon Howard

Parties of Record:

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Case No(s). 22-1094-WW-AIR, 22-1096-ST-AIR

Summary: Motion Joint Motion electronically filed by Mrs. Tonnetta Y. Scott on
behalf of PUCO.