

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Smart :  
Grid Modernization Initiative Contained :  
in the Tariffs of Ohio Edison Company, : Case No. 12-406-EL-RDR  
The Cleveland Electric Illuminating :  
Company, and The Toledo Edison :  
Company.

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

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The Staff of the Public Utilities Commission of Ohio (Staff) hereby requests that certain information in its Reply Comments filed in this docket be kept confidential pursuant to O.A.C. 4901-1-24. The accompanying memorandum in support sets forth the grounds for this motion.

Respectfully submitted,

**Michael DeWine**  
Ohio Attorney General  
**William L. Wright**  
Section Chief

*/s/ Thomas G. Lindgren*

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## MEMORANDUM IN SUPPORT

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The confidential version of the Staff's Reply Comments filed in this docket contains information that was originally provided by the FirstEnergy companies to the Office of the Ohio Consumers' Counsel in response to a discovery request. FirstEnergy asserted that this information constituted a trade secret under Ohio law.

While Staff takes no position on the merits of this claim of confidentiality, Staff has filed its Reply Comments under seal. In accordance with the Commission's rules, Staff has also filed a public version that has this information redacted.

For the foregoing reasons, Staff requests that the Commission issue a protective order pursuant to Ohio Admin. Code 4901-1-24(D).

Respectfully submitted,

**Michael DeWine**  
Ohio Attorney General

**William L. Wright**  
Section Chief

*/s/ Thomas G. Lindgren*

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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 hand-delivered, upon the following Parties of Record, this 22nd day of April, 2013.

/s/ Thomas G. Lindgren

**Thomas G. Lindgren**  
Assistant Attorney General

### **Parties of Record:**

Deb J. Bingham  
Terry Etter  
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Kathy J. Kolich  
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Summary: Motion Motion for Protective Order electronically filed by Mrs. Tonneta Y Scott on behalf of PUCO