

**BEFORE THE
PUBLIC UTILITIES COMMISSION OF OHIO**

In the matter of the
2013 Alternative Energy
Portfolio Status Report of
ArcelorMittal USA LLC.

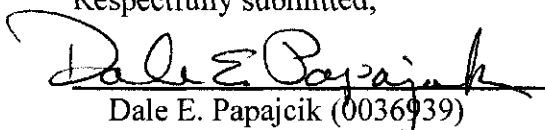
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Case No. 14-0663-EL-ACP

MOTION OF ARCELORMITTAL USA LLC FOR PROTECTIVE ORDER

ArcelorMittal USA LLC (AMUSA), by its attorneys and pursuant to Section 4901-1-24(D) of the Commission's Rules (O.A.C. § 4901-1-24(D)) moves for a protective order keeping confidential the designated confidential and/or proprietary information contained in AMUSA's Alternative Energy Portfolio Status Report for 2013. Hard copy redacted and unredacted versions of that Report are being filed with the Commission contemporaneously with this instant motion. The request for protection pertains to information concerning the specific volumes and prices of AMUSA's electricity purchases. The reasons underlying this Motion are detailed in the attached Memorandum in Support. Consistent with the requirements of Section 4901-1-24(D) of the Commission's Rules, AMUSA will be filing an unredacted version of its Report containing the information which is the subject of this Motion under seal.

Respectfully submitted,



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April 16, 2014

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**MEMORANDUM IN SUPPORT OF
ARCELORMITTAL USA LLC'S MOTION FOR PROTECTIVE ORDER**

ArcelorMittal USA LLC (AMUSA) respectfully requests that certain information in its 2013 Alternative Energy Portfolio Status Report be treated as confidential and/or proprietary (along with any and all copies, including electronic copies) and be protected from public disclosure. This information concerns the specific volumes and prices of AMUSA's electricity purchases. This information is not generally available to the public and its public disclosure would competitively disadvantage AMUSA in its ongoing electricity purchasing activities. The company's policy is to provide third parties access to this type of sensitive information only upon execution of a strict confidentiality agreement that protects against disclosure, so as to avoid the competitive disadvantages that could result from public disclosure of such information.

Rule 4901-1-24(D) of the Ohio Administrative Code provides that the Commission or certain designated employees may issue an order which is necessary to protect the confidentiality of information contained in documents filed with the Commission to the extent that state or federal law prohibits the release of the information, and where non-disclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code. Pursuant to OAC 4901-1-24(D) and other applicable Ohio law, AMUSA requests that the designated information be protected from public disclosure for a reasonable period of time. The Commission has previously granted confidential treatment to similar information. *See In the Matter of the*

Application of Constellation Energy Gas Choice, LLC for Certification as a Competitive Retail Natural Gas Supplier, Case No. 02-1773-GA-CRS (Entry dated October 26, 2012).

Consistent with the requirements of Section 4901-1-24(0) of the Commission's Rules, an unredacted confidential version of AMUSA's response have been filed under seal and a redacted version has been provided for the Commission's public files.

Respectfully submitted,



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