

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

**In the Matter of the Application of Ohio Edison)
Company, The Cleveland Electric Illuminating)
Company, and The Toledo Edison Company for)
Authority to Provide for a Standard Service)
Offer Pursuant to R.C. 4928.143 in the Form of)
an Electric Security Plan.)
)
)**

Case No. 14-1297-EL-SSO

**THE PJM POWER PROVIDERS GROUP’S AND
THE ELECTRIC POWER SUPPLY ASSOCIATION’S
JOINT MOTION FOR PROTECTIVE ORDER**

Pursuant to Rule 4901-1-24 of the Ohio Administrative Code, the PJM Power Providers Group (“P3”) and the Electric Power Supply Association (“EPSA”) jointly file this motion respectfully requesting that the Public Utilities Commission of Ohio (“the Commission”) issue a protective order to protect a portion of their joint memorandum contra filed earlier today in these proceedings for the reasons set forth in the attached memorandum in support. The joint memorandum contra was filed in response to FirstEnergy Solutions Corp.’s motion to quash.

WHEREFORE, P3 and EPSA respectfully request that the Commission issue a protective order protecting a portion of their memorandum contra.

Respectfully submitted,

s/ Michael J. Settineri
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MEMORANDUM IN SUPPORT

Contemporaneously with this motion, P3 and EPSA have jointly filed a memorandum contra in response to the motion to quash of FirstEnergy Solutions Corp. The memorandum contra was publicly filed in a redacted form and three copies of the memorandum contra containing the confidential portion were submitted under seal in compliance with Rule 4901-1-24 of the Ohio Administrative Code. By this Motion, P3 and EPSA respectfully request confidential treatment of the unredacted portions submitted under seal. Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively “FirstEnergy”) have alleged that the redacted information contained in the memorandum contra is confidential and competitively sensitive and subject to a protective agreement between FirstEnergy and P3 and EPSA. P3 and EPSA reserve the right to challenge whether the information submitted under seal is a confidential trade secret under Ohio law, but files this Motion for Protective Order and Memorandum in Support to provide confidential treatment of the redacted information in the memorandum contra.

WHEREFORE, the PJM Power Providers Group and the Electric Power Supply Association respectfully request that this Motion for Protective Order be granted for the reasons set forth above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 15th day of December, 2014.

s/ Michael J. Settineri
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Summary: Motion for Protective Order electronically filed by Mr. Michael J. Settineri on behalf of PJM Power Providers Group and Electric Power Supply Association