**BEFORE**
**THE PUBLIC UTILITIES COMMISSION OF OHIO**

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|---|---|---|
| **In the Matter of the Application of Ohio Edison Company, The Cleveland Electric Company, and The Toledo Edison Illuminating 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** |

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## MOTION FOR PROTECTIVE ORDER

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Pursuant to the provisions of Rule 4901-1-24, Ohio Administrative Code ("OAC"), Sierra Club respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of portions of the Direct Testimony of Tyler Comings, including supporting workpapers and exhibits, which were filed on December 22, 2014. Sierra Club seeks this protective order for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

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## MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, Sierra Club has filed the Direct Testimony of Tyler Comings, together with supporting workpapers and exhibits. Sierra Club has filed these papers in both a redacted form and in an unredacted form under seal. By this Motion, Sierra Club requests confidential treatment of the unredacted portions filed under seal. Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (the "Companies") have designated information contained in these documents as confidential or competitively sensitive confidential, and have produced the information subject to a protective agreement between the Companies and Sierra Club. Sierra Club reserves the right to challenge whether the information is a confidential trade secret under Ohio law, but files this Motion for Protective Order and Memorandum in Support pursuant to the parties' protective agreement.

WHEREFORE, Sierra Club respectfully requests that this Motion for Protective Order be granted for the reasons set forth herein.

Respectfully submitted,

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Attorneys for Sierra Club

## CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion for Protective Order and Memorandum in Support were served upon the following parties via electronic mail on December 22, 2014:

/s/ Christopher J. Allwein

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Summary: Motion for Protective Order electronically filed by Mr. Christopher J. Allwein on behalf of SIERRA CLUB