

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio)	
Edison Company, The Cleveland)	Case No. 14-1297-EL-SSO
Electric Illuminating Company, and The)	
Toledo Edison Company for Authority to)	
Provide a Standard Service Offer)	
Pursuant to R.C. 4925.143 in the Form)	
of an Electric Security Plan.)	

**MOTION OF THE KROGER CO. FOR PROTECTIVE ORDER AND
MEMORANDUM IN SUPPORT**

Pursuant to Ohio Administrative Code ("OAC") 4901-1-24(D), The Kroger Co. ("Kroger") respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a protective order that provides that Attachment KCH-1 of Kevin Higgins' prefiled Direct Testimony filed on behalf of Kroger on December 22, 2014 in this proceeding remains under seal for the reasons set forth in the attached memorandum in support.

Respectfully submitted,

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MEMORANDUM IN SUPPORT

Kroger filed Attachment KCH-1 of Kevin Higgins' prefiled Direct Testimony in this proceeding under seal on December 22, 2014. Kroger respectfully requests that the Commission issue an order that provides that Attachment KCH-1 will remain under seal. Ohio Edison Company, The Toledo Edison Company, and Cleveland Electric Illuminating Company (collectively, the "Companies") have designated information contained in Attachment KCH-1 as confidential and competitively sensitive, and produced the information subject to a protective agreement between Kroger and the Companies. Kroger seeks protective treatment of this information in order to comply with the protective agreement between Kroger and the Companies. Kroger takes no position at this time regarding whether the information in Attachment KCH-1 is confidential or protected information.

For the reasons set forth above, Kroger respectfully requests the Commission to grant this Motion for Protective Order.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing *Kroger's Motion for Protective Order* was served this 22nd day of December, 2014 upon the following via electronic mail.

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Summary: Motion Kroger's Motion for Protective Order electronically filed by Mr. Devin D. Parram on behalf of Kroger and Mr.