

**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)	Case No. 14-1297- EL-SSO
Standard Service Offer Pursuant to)	
R.C. 4928.143 in the Form of An Electric)	
Security Plan)	

**MOTION FOR PROTECTIVE ORDER FOR
SIERRA CLUB'S MOTION TO COMPEL DISCOVERY
RESPONSES AND REQUEST FOR EXPEDITED RULING**

Pursuant to the provisions of Rule 4901-1-24, Ohio Administrative Code, Sierra Club respectfully requests that the Public Utilities Commission of Ohio issue a Protective Order for the confidentiality of (a) portions of its Memorandum in Support of the Motion to Compel Discovery Responses and Request for Expedited Ruling, filed on April 27, 2015; and (b) portions of the discovery responses and other exhibits attached to that Memorandum in Support. 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 OF MOTION FOR PROTECTIVE
ORDER FOR SIERRA CLUB’S MOTION TO COMPEL DISCOVERY
RESPONSES AND REQUEST FOR EXPEDITED RULING**

Contemporaneous with this Motion, Sierra Club has filed a has filed a Motion to Compel Discovery Responses and Request for Expedited Ruling, together with several discovery responses and other exhibits attached to the Memorandum in Support of that Motion. These filings reference documents and information that have been designated as confidential or competitively sensitive confidential by the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, the “Companies”). Sierra Club is filing this Motion and related documents in both a redacted form and, under seal, in an unredacted form.

By this Motion, Sierra Club requests confidential treatment of the unredacted portions filed under seal. 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 under the parties’ protective

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

Respectfully submitted,

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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 April 27, 2015.

/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