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BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

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) 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

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 following witnesses' deposition transcripts:

- Raymond Evans (deposition taken July 2, 2015)
- Paul Harden (deposition taken January 16, 2015)
- Jason Lisowski (deposition taken December 19, 2014)
- Donald Moul (depositions taken January 15, 2015, and June 24, 2015)
- Rodney Phillips (deposition taken July 1, 2015)
- Judah Rose (deposition taken January 7, 2015)
- Jay Ruberto (deposition taken January 8, 2015); and
- Joanne Savage (deposition taken January 27, 2015)

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These confidential deposition transcripts are being filed contemporaneously with this motion on August 24, 2015. Sierra Club seeks this protective order for the reasons set forth in the attached Memorandum in Support.

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Respectfully submitted,

/s/ Richard C. Sahli

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Attorneys for Sierra Club

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Edison Company, The Cleveland Electric	)	
Company, and The Toledo Edison Illuminating	)	
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	)	

MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, Sierra Club has filed the confidential portions of the following witnesses' deposition transcripts:

- Raymond Evans (deposition taken July 2, 2015)
- Paul Harden (deposition taken January 16, 2015)
- Jason Lisowski (deposition taken December 19, 2014)
- Donald Moul (depositions taken January 15, 2015, and June 24, 2015)
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- Judah Rose (deposition taken January 7, 2015)
- Jay Ruberto (deposition taken January 8, 2015); and
- Joanne Savage (deposition taken January 27, 2015)

Sierra Club has filed these transcripts in an unredacted form under seal. By this Motion, Sierra Club requests confidential treatment of these unredacted transcripts. 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. 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 August 24, 2015.

Date: August 24, 2015

/s/ Richard C. Sahli

Richard C. Sahli

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