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BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

|                                          |   |                         |
|------------------------------------------|---|-------------------------|
| In the Matter of the Application Seeking | ) |                         |
| Approval of Ohio Power Company's         | ) |                         |
| Proposal to Enter into an Affiliate      | ) | Case No. 14-1693-EL-RDR |
| Power Purchase Agreement for             | ) |                         |
| Inclusion in the Power Purchase          | ) |                         |
| Agreement Rider                          | ) |                         |
|                                          | ) |                         |
| In the Matter of the Application of      | ) |                         |
| Ohio Power Company for Approval of       | ) | Case No. 14-1694-EL-AAM |
| Certain Accounting Authority             | ) |                         |

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MOTION FOR PROTECTIVE ORDER  
BY  
SIERRA CLUB

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Pursuant to Rule 4901-1-24, Ohio Administrative Code, 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 Paul L. Chernick, including supporting exhibits, which were filed on September 11, 2015 in this proceeding. Sierra Club seeks this protective order for the reasons set forth in the attached Memorandum in Support.

Dated: September 11, 2015

Respectfully submitted,

/s/ Tony G. Mendoza  
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**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

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| <b>In the Matter of the Application Seeking</b> | ) |                                |
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| <b>Power Purchase Agreement for</b>             | ) |                                |
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| <b>Agreement Rider</b>                          | ) |                                |
|                                                 | ) |                                |
| <b>In the Matter of the Application of</b>      | ) |                                |
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| <b>Certain Accounting Authority</b>             | ) |                                |

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**MEMORANDUM IN SUPPORT**

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Contemporaneous with this Motion, Sierra Club has filed the Direct Testimony of Paul L. Chernick, including supporting exhibits, with the Commission. 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 Power Company (the "Company") has designated information contained in these documents as confidential or competitively sensitive confidential and has produced the information subject to a protective agreement between the Company 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.

Dated: September 11, 2015

Respectfully submitted,

/s/ Tony G. Mendoza

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Attorneys for Sierra Club

## CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing Motion for Protective Order by Sierra Club upon the following parties via electronic mail.

Date: September 11, 2015

/s/ Tony G. Mendoza

Tony G. Mendoza

### PERSONS SERVED

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