

FILE

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

MOTION FOR PROTECTIVE ORDER
BY
SIERRA CLUB

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 Third Supplemental Testimony of Tyler Comings, which was filed on December 30, 2015 in this proceeding. Sierra Club seeks this protective order for the reasons set forth in the attached Memorandum in Support.

Dated: December 30, 2015

Respectfully submitted,

/s/Richard C. Sahli
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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 Company for Authority to Provide for a 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 Third Supplemental Testimony of Tyler Comings with the Commission. Sierra Club has filed this testimony 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. The Ohio Edison Company, The Cleveland Electric Company, and The Toledo Edison Company (the “Companies”) have designated information contained in this testimony 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.

Dated: December 30, 2015

Respectfully submitted,

/s/Richard C. Sahli

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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: December 30, 2015

s/Shannon Fisk

Shannon Fisk

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