

BEFORE THE OHIO POWER SITING BOARD

In the Matter of the Application of)
Champaign Wind LLC for a Certificate to) Case No. 12-0160-EL-BGN
Install Electricity Generating Wind)
Turbines in Champaign County)

**MOTION TO EXTEND CURRENT PROTECTIVE ORDERS AND KEEP PROTECTED
INFORMATION CONFIDENTIAL WHILE NEW MOTION TO EXTEND PROTECTIVE
ORDERS IS PENDING**

Gamesa Wind US, LLC (“Gamesa”), by and through its attorneys, respectfully requests that the Ohio Power Siting Board (the “Board”) extend the current protections over Gamesa’s trade secret information and keep the protected information identified in the Board’s May 28, 2013 Opinion, Order, and Certificate (the “Order”) confidential while Gamesa’s Motion to Extend its Protective Orders is pending for the reasons set forth below.

In the above-captioned proceeding, to which Gamesa is not a party, Gamesa was served with a subpoena duces tecum that requested Gamesa’s trade secret information. Gamesa filed Motions for Protective Order before this Board to prevent public disclosure of trade secret information, and the Board entered an Order finding Gamesa’s General Characteristics Manual for the G97 turbine model (the “Manual”) contained trade secret information and granting the protections Gamesa sought. On March 19, 2015, Gamesa sought an extension of the protections ordered in the Board’s Order, which information remains highly sensitive trade secrets, and the Board granted Gamesa’s Motion to Extend its Protective Orders.

The current extension of its Protective Orders expires on June 1, 2017. Gamesa is aware that under the applicable rule a motion to extend a protective order should be

filed at least 45 days in advance of the expiration of the existing order. O.A.C. 4906-2-21. The failure to file its Motion to Extend its Protective Orders within this deadline was an inadvertent oversight by Gamesa's counsel. On May 30, 2017, upon becoming aware of the upcoming expiration, Gamesa immediately prepared and filed a new Motion to Extend its Protective Order. Accordingly, Gamesa respectfully seeks an extension of the current protection over Gamesa's trade secrets and confidential information, which expires on June 1, 2017, pending approval of the new Motion to Extend the Protective Orders filed with the Board.

This motion for extension is not made for purposes of delay and will not prejudice any parties in interest. As stated above, the failure to file the Motion to Extend the Protective Orders within the deadline was an inadvertent oversight. Additionally, the information Gamesa seeks to protect, which remains highly sensitive and confidential, is covered by Rule 4906-2-21(D) and constitutes trade secrets under Ohio law. Wherefore, Gamesa respectfully requests that the Board extend the current protections of the Protective Orders until such time that the Board can review and approve the new Motion to Extend the Protective Orders.

May 30, 2017

Respectfully submitted,

/s/ David Proano

Martin T. Booher (0090333)

David Proano (0078838)

Kendall C. Kash (0093717)

Baker & Hostetler LLP

127 Public Square, Suite 2000

Cleveland, Ohio 44114

(216) 621-0200

mbooher@bakerlaw.com

dproano@bakerlaw.com

kkash@bakerlaw.com

Counsel for Gamesa Wind US, LLC

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

5/30/2017 4:46:47 PM

in

Case No(s). 12-0160-EL-BGN

Summary: Motion to Extend Gamesa's Current Protective Orders Pending Approval of New Motion to Extend electronically filed by Kendall C Kash on behalf of Gamesa Wind US, LLC