

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of Ohio Edison)	
Company, the Cleveland Electric Illuminating)	Case No. 17-974-EL-UNC
Company, and the Toledo Edison Company's)	
Compliance with R.C. 4928.17 and Ohio)	
Administrative Code Chapter 4901:1-37)	

**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR PROTECTIVE ORDER
AND MEMORANDUM IN SUPPORT**

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NOVEMBER 23, 2021

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**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR PROTECTIVE ORDER**

Pursuant to the provisions of Rule 4901-1-24(D), Ohio Administrative Code ("O.A.C."), the Industrial Energy Users-Ohio ("IEU-Ohio") respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of the Industrial Energy Users-Ohio's Initial Comments to the Review of Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company's ("FirstEnergy") Compliance with R.C. 4928.17 and Ohio Administrative Code Chapter 4901:1-37, in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Matthew R. Pritchard

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MEMORANDUM IN SUPPORT

On November 22, 2021, IEU-Ohio filed the public version of its Initial Comments. IEU-Ohio has also submitted the confidential version of its comments to the Commission in accordance with the Commission's rules regarding confidential filings. By this Motion, IEU-Ohio requests confidential treatment of the confidential portions filed under seal. The confidential portion was designated as confidential information by FirstEnergy and the information was produced subject to a protective agreement between FirstEnergy and IEU-Ohio. IEU-Ohio takes no position as to 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 protective agreement executed by IEU-Ohio.

Respectfully submitted,

/s/ Matthew R. Pritchard
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CERTIFICATE OF SERVICE

In accordance with Ohio Adm.Code 4901-1-05, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion for Protective Order and Memorandum in Support of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for IEU-Ohio to the following parties of record this 23rd day of November 2021, via electronic transmission.

/s/ Matthew R. Pritchard

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Summary: Motion for Protective Order electronically filed by Mr. Matthew R.
Pritchard on behalf of Industrial Energy Users-Ohio