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**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

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PUCO

In the Matter of the Commission Order)
Workshop Regarding Smart Metering) Case No. 07-646-EL-UNC
Deployment.)

In the Matter of the Commission's)
Response to Provisions of the Federal)
Energy Policy Act of 2005 Regarding Net) Case No. 05-1500-EL-COI
Metering, Smart Metering and Demand)
Response, Cogeneration and Power)
Production Purchase and Sale)
Requirements, and Interconnection.)

In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric)
Illuminating Company, and The Toledo) Case No. 07-551-EL-AIR
Edison Company for Authority to Increase) Case No. 07-552-EL-ATA
Rates for Distribution Service, Modify) Case No. 07-553-EL-AAM
Certain Accounting Practices and for) Case No. 07-554-EL-UNC
Tariff Approvals.)

In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric) Case No. 08-935-EL-SSO
Illuminating Company and The Toledo)
Edison Company for Authority to)
Establish a Standard Service Offer)
Pursuant to R.C. 4928.143 in the Form of)
an Electric Security Plan.)

**MEMORANDUM CONTRA FIRSTENERGY'S
MOTION FOR PROTECTION
BY
THE OFFICE OF THE OHIO CONSUMERS' COUNSEL**

I. INTRODUCTION AND STATEMENT OF THE CASE

On July 1, 2009, Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company, (collectively, "FirstEnergy" or the

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“Companies”) filed a Request for Staff Review of Draft Stimulus Application (“Request”) in Case No. 08-935-EL-SSO (“SSO Case”), and accompanied that pleading with a Motion for Protective Order (“Motion”) regarding the contents of Exhibit 1 to the Request (“Exhibit 1”). FirstEnergy identifies Exhibit 1 as the “Companies’ Stimulus Act Application,”¹ which was filed under seal with the Public Utilities Commission of Ohio (“PUCO” or “Commission”).

The Companies’ filings responded to an Entry on May 21, 2009 (“May 21 Entry”) that directed the Companies to file their draft funding application for review. The May 21 Entry summarizes the connection between the study of AMI/SmartGrid improvements to FirstEnergy’s distribution system and the multiple captions located on the May 21 Entry (reproduced by the OCC in the instant pleading). Important in these connections is the requirement contained in Case Nos. 07-551-EL-AIR, et al. (“Distribution Rate Case”) that FirstEnergy work on an AMI strategy by June 1, 2009 in connection with Case No. 07-646-EL-UNC (“AMI Workshop Case”) and the requirement in Case No. 08-935-EL-SSO (“ESP Case”) that FirstEnergy pursue federal funds for development of smart grid investment.²

Following PUCO approval of an extension to the June 1, 2009 deadline in the Distribution Rate Case,³ FirstEnergy filed its Request and Motion in only the ESP Case and failed to serve its filings on parties to that case. The OCC contacted FirstEnergy

¹ Request at 3 (July 1, 2009).

² May 21 Entry at 3, ¶(5).

³ May 21 Entry at 4, ¶(11).

counsel and obtained, subject to a protective agreement, an unredacted copy of Exhibit 1. FirstEnergy thereafter served the OCC with its pleadings on July 6, 2009.⁴

II. ARGUMENT

A. The Law Regarding Claims of Confidentiality

FirstEnergy's Motion does not address any of the statutes, rules, Commission precedent, or policy issues surrounding the request for confidential treatment contained in its Motion. Ohio Adm. Code 4901-1-27(B)(7)(e) requires that "[t]he party requesting such protection shall have the burden of establishing that such protection is required." The reason for this burden upon FirstEnergy is "the inherent, fundamental policy of R.C. 149.43 ... to promote open government, not restrict it."⁵

R.C. 149.43 is Ohio's public records law that has been addressed in numerous proceedings before the Commission. R.C. 4901.12 requires that "all proceedings of the public utilities commission and all documents and records in its possession are public records," except as provided in the exceptions under R.C. 149.43. The Commission has noted that R.C. 4901.12 and R.C. 4905.07 "provide a strong presumption in favor of disclosure, which the party claiming protective status must overcome."⁶

⁴ Ohio Adm. Code 4901-1-05(A) requires "all pleadings or papers filed with the commission subsequent to the original filing or commission entry initiating the proceeding shall be served upon all parties no later than the date of filing."

⁵ *Besser v. Ohio State University* (August 9, 2000), 89 Ohio St. 3d 396, 396.

⁶ *In the Matter of the Joint Application of the Ohio Bell Telephone Company and Ameritech Mobile Services, Inc. for Approval of the Transfer of Certain Assets*, Case No. 89-365-RC-ATR, *Opinion and Order* at 5 (October 18, 1990).

Ohio Adm. Code 4901-1-24(D) requires of the PUCO that “[a]ny order issued under this paragraph shall minimize the amount of information protected from public disclosure.” The Commission stated in a 2004 case:

The Commission has emphasized, in *In the Matter of the Application of The Ohio Bell Telephone Company for Approval of an Alternative Form of Regulation*, Case No. 93-487-TP-ALT, Entry issued November 23, 2003, that:

[a]ll proceedings at the Commission and all documents and records in its possession are public records, except as provided in Ohio’s public records law (Section 149.43, Revise Code) and as consistent with the purposes of Title 49 of the Revised Code. Ohio public records law is intended to be liberally construed to ‘ensure that governmental records be open and made available to the public ... subject to only a few very limited exceptions.’ *State ex. rel. Williams v. Cleveland* (1992), 64 Ohio St. 3d 544, 549, [other citations omitted].⁷

The Commission’s Entry in the above-quoted case is as informative for its details as it is for the cited legal authority. Faced with demands for “wholesale removal of the document from public scrutiny,”⁸ the Commission reviewed several documents and determined in each case how documents could be redacted “without rendering the remaining document incomprehensible or of little meaning....”⁹

The Commission has also used a balancing approach in its review of motions for protective orders. For instance, the PUCO has noted “it is necessary to strike a balance between competing interests. On the one hand, there is the applicant’s interest in keeping certain business information from the eyes and ears of its competitors. On the other

⁷ *In re MxEnergy, Inc.*, Case No. 02-1773-GA-CRS *et al.*, Entry at (3) (September 7, 2004) (notations in original).

⁸ *Id.* at 3.

⁹ *Id.*

hand, there is the Commission's own interest in deciding this case through a fair and open process, being careful to establish a record which allows for public scrutiny of the basis for the Commission's decision."¹⁰

The Ohio Supreme Court has addressed the test for protection from disclosure under R.C. 149.43 as the "state or federal law" exemption.

We have also adopted the following factors in analyzing a trade secret claim:

(1) The extent to which the information is known outside the business; (2) the extent to which it is known to those inside the business, *i.e.*, by the employees; (3) the precautions taken by the holder of the trade secret to guard the secrecy of the information; (4) the savings effected and the value to the holder in having the information as against competitors; (5) the amount of effort or money expended in obtaining and developing the information; and (6) the amount of time and expense it would take for others to acquire and duplicate the information.¹¹

The analysis of these factors regarding the documents in question should be contained in any request to protect documents from public view. Broad, summary statements that information is sensitive information do not meet this requirement. The Commission's rules, especially Ohio Adm. Code 4901-1-24(D)(3), reflects the need for specificity from those that seek to keep information from the public record.

B. FirstEnergy's Motion is Deficient

FirstEnergy makes little effort to satisfy the Commission's requirements on the subject of requesting protective orders. The subject of seeking protective orders is the

¹⁰ *In the Matter of the Application of Rapid Transmit Technology Inc. for Certificate of Public Convenience and Necessity to Provide Local Telecommunications Service in the State of Ohio*, Case No. 99-890-TP-ACE, Entry at 2-3 (October 1, 1999); see also *In the Matter of the Joint Application of the Ohio Bell Telephone Company and Ameritech Mobile Services, Inc. for Approval of the Transfer of Certain Assets*, Case No. 89-365-RC-ATR at 7 (October 18, 1990) (holding that "any interest which the joint applicants might have in maintaining the confidentiality of this information [fair market value and net book value of assets proposed to be transferred] is outweighed by the public's interest in disclosure.").

¹¹ *Besser* at 399-400.

matter of Ohio Adm. Code 4901-1-24, aptly entitled “Motions for protective orders.”

FirstEnergy’s pleading violates many of the provisions contained in that rule.

Ohio Adm. Code 4901-1-24(D)(1) requires that “[a]ll documents submitted pursuant to paragraph (D) of this rule should be filed with only such information redacted as is essential to prevent disclosure of the allegedly confidential information.”

FirstEnergy made no effort to redact only the information that it considers confidential.¹²

Without discussing the material submitted under seal in detail, it even contains blank forms that reveal nothing about the infrastructure improvements or requests for additional funding that FirstEnergy states is the basis for the requested confidential treatment.

While FirstEnergy would like to conduct regulatory dealings in private (including when the subject is federal stimulus funding paid by the American public), the Commission should recognize the generally public nature of regulation and the failure of FirstEnergy to make even minimal efforts to satisfy Ohio Adm. Code 4901-1-24(D)(1). Apparently FirstEnergy believes its responsibilities can be pushed off on the Commission personnel whose responsibilities include “minimize[ing] the amount of information protected from public disclosure.”¹³

Ohio Adm. Code 4901-1-24(D)(3) requires that the memorandum in support of the motion for protection must “includ[e] a detailed discussion of the need for protection from disclosure, and citations of any authorities relied upon.” FirstEnergy’s Memorandum in Support merely makes the summary statement that “public disclosure could adversely affect the Companies’ opportunity to be awarded stimulus funds” and that the draft “contains confidential information pertaining to the Companies’ distribution

¹² The OCC cannot view the documents held by the PUCO’s Docketing Division under seal. However, the copy obtained by OCC from FirstEnergy also, if filed in the form that the OCC can observe, violates Ohio Adm. Code 4901-1-24(D)(2) that requires “[e]ach page of the allegedly confidential material filed under seal [to] be marked as “confidential,” “proprietary,” or “trade secret.”

¹³ Ohio Adm. Code 4901-1-24(D).

infrastructure and system.”¹⁴ FirstEnergy makes no attempt -- let alone provide the “detailed discussion” required by Ohio Adm. Code 4901-1-24(D)(3) -- to connect the opportunity to obtain stimulus funds to the sections contained in the draft document that is the subject of FirstEnergy’s Motion.¹⁵

Furthermore, the summary statement that information is confidential because it relates to FirstEnergy’s “distribution infrastructure and system” is overbroad and could be used to shield an overly wide range of filings with the Commission and discussions attached thereto. Ohio law, as stated above, provides that documents be reviewed for “the value to the holder in having the information as against *competitors*”¹⁶ Important to the Companies’ claim is that the Motion pertains to facilities that provide distribution service that is provided by FirstEnergy as a *monopoly*.¹⁷ FirstEnergy’s Motion fails to meet the requirements of Ohio Adm. Code 4901-1-24(D)(3).

C. The Proper Treatment of FirstEnergy’s Document

The situation faced by the OCC, and ultimately the Commission, is that customers are interested in a successful FirstEnergy application for federal funding of smart grid investment in Ohio, but the Companies’ have left it to others to sort through their deficient pleadings. The theme developed in FirstEnergy’s pleadings -- by means of overly broad redactions, summary statements, filings in only one docket, and failure to serve documents -- is that parties that have participated in numerous proceedings that

¹⁴ Motion (Memorandum in Support) at 2.

¹⁵ For example, FirstEnergy does not explain how the protection of the blank forms contained in the draft is connected with its ability to obtain stimulus funding.

¹⁶ *Besser* at 399-400 (emphasis added).

¹⁷ A recent Supreme Court of Ohio decision upheld *selective redactions* in a PUCO docket. *Ohio Consumers’ Counsel v. Public Util. Comm.*, 2009-Ohio-604. The Court noted that “[e]xposing a competitor’s business strategies and pricing points would likely have a negative impact on that provider’s viability.” *Id.* at ¶31 (emphasis added). In contrast, FirstEnergy asks for withholding an *entire document* based on the argument that facilities that support its *non-competitive services* should not be discussed in public.

have dealt with smart grid development are not welcome to continue their participation. The Commission should instruct FirstEnergy otherwise.

Regarding the protection of Exhibit 1, the Commission should reject FirstEnergy's overly broad argument that the public should not have access to information regarding "the Companies' distribution infrastructure and system."¹⁸ The PUCO should redact only those portions of Exhibit 1 that serve the purpose of encouraging the funding application for smart grid infrastructure development. The protection provided should be limited in time. Ohio Adm. Code 4901-1-24(F) provides that, "[u]nless otherwise ordered, any order prohibiting public disclosure . . . shall automatically expire eighteen months after the date of its issuance" Eighteen months is too long for a document that will soon be superseded by a final application for funding. Any protective order should expire upon FirstEnergy's submission of its application for federal funding of the smart grid development. FirstEnergy should be required to apply, if desired, to extend a protective order for any period after its submission of an application for federal funding of smart grid development.

The Companies should also be ordered to serve parties to the cases captioned in the instant pleading -- the same caption used by the Commission in the May 21 Entry -- with all additional filings regarding smart grid development that stem from any of the cases. In particular, the May 21 Entry requires the Companies to file a comprehensive study no later than August 14, 2009.¹⁹ That study and all associated pleadings should be filed in the above-captioned cases and served upon parties of record. If any subsequent

¹⁸ Motion (Memorandum in Support) at 2.

¹⁹ May 21, 2009 Entry at 5, ¶(13).

filing is made under seal, the unredacted document should be provided to all parties with whom FirstEnergy has executed a protective agreement and should be governed by such protective agreement.²⁰

III. CONCLUSION

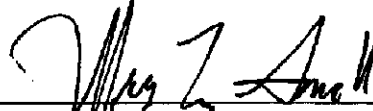
The Commission should deny FirstEnergy's implicit request that Exhibit 1 to the Request submitted on July 1, 2009 be afforded confidential treatment for a period of eighteen months. Information in Exhibit 1 that deserves confidential treatment should be held confidential only until such time that the Companies' final application for funding is submitted to the Department of Energy. The Commission should require any additional requests for confidential treatment of information to be submitted to the PUCO according to Ohio law and the Commission's rules that implement that law.

Furthermore, the Companies should be ordered to file their submissions regarding its smart grid development in all of the above-captioned cases and serve them on parties to the cases. Unredacted copies should be provided to parties under appropriate protective agreements.

²⁰ The OCC should be provided with all documents filed under seal. The OCC is willing to handle such documents under the terms of the protective agreement executed in the ESP Case (i.e. the same treatment given to Exhibit 1).

Respectfully submitted,

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A handwritten signature in black ink, appearing to read "Jeffrey L. Small", is written over a horizontal line.

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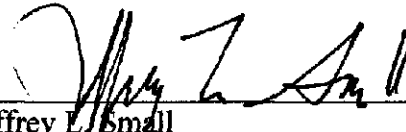
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Memorandum Contra was served via electronic transmission and via U.S. Mail, prepaid, to the persons listed below (including the Attorney Examiners, via electronic transmission), on this 13th day of July 2009.



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