

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of Ohio	)	
Edison Company, The Cleveland Electric	)	
Illuminating Company, and The Toledo	)	Case Nos. 12-2190-EL-POR
Edison Company for Approval of Their	)	12-2191-EL-POR
Energy Efficiency and Peak Demand	)	12-2192-EL-POR
Reduction Portfolio Plans for 2013	)	
through 2015	)	

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**MOTION FOR PROTECTIVE ORDER BY THE ENVIRONMENTAL LAW AND  
POLICY CENTER AND THE OHIO ENVIRONMENTAL COUNCIL**

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As part of the energy efficiency collaborative process required by the Public Utilities Commission of Ohio (“Commission” or “PUCO”), Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company (collectively “FirstEnergy” or “Companies”) have shared with stakeholders certain information about energy efficiency programs and activities. The Environmental Law and Policy Center (“ELPC”) and the Ohio Environmental Council (“OEC”) have moved the Commission for a determination that these materials are not confidential and should be shared with the public. Attached to this motion as Attachment A, and for the Commission’s benefit, is an example of collaborative materials in the form of a Powerpoint presentation by FirstEnergy.

FirstEnergy has claimed that all information shared through the collaborative process, including the Attachment A presentation, is confidential and not to be shared with the public. As stated above, ELPC and OEC strongly disagree with this assessment and have requested a ruling from the Commission to resolve this dispute. However, ELPC and OEC will not publicly disclose information FirstEnergy claims to be confidential before a Commission ruling that

public disclosure is allowed. Therefore, ELPC and OEC respectfully request that the Commission accept Attachment A under seal until it issues its ruling in this matter.

Respectfully submitted,

/s/ Robert Kelter

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## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Motion, submitted on behalf of the Environmental Law & Policy Center and Ohio Environmental Council, was served by electronic mail upon the following Parties of Record this 16<sup>th</sup> day of July, 2014.

/s/ Nicholas McDaniel

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**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**7/16/2014 12:41:05 PM**

**in**

**Case No(s). 12-2190-EL-POR, 12-2191-EL-POR, 12-2192-EL-POR**

Summary: Motion Motion for Protective Order electronically filed by Mr. Robert Kelter on behalf of Environmental Law & Policy Center and Ohio Environmental Council