

FILE

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 No. 14-1297-EL-SSO
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)

MOTION FOR PROTECTIVE ORDER AND MEMORANDUM IN SUPPORT OF IGS
ENERGY

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December 10, 2014

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MOTION FOR PROTECTIVE ORDER

Pursuant to the provisions of Rule 4901-1-24, Ohio Administrative Code ("OAC"), Interstate Gas Supply, Inc. ("IGS" or "IGS Energy") respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of portions of its Motion to Compel and Memorandum in Support, as well as Attachment 2 and Attachment 6 filed on December 10, 2014, in these proceedings for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,



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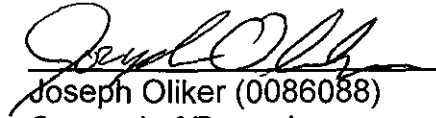
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MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, IGS has filed a Motion to Compel and Attachments 2 and 6 in a redacted form and in an unredacted form under seal. By this Motion, IGS requests confidential treatment of the unredacted portions filed under seal. Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively "FirstEnergy") has designated information contained in these documents as confidential and competitively sensitive and produced the information subject to a protective agreement between FirstEnergy and IGS. IGS reserves the right to challenge whether the formation is a confidential trade secret under Ohio law, but files this Motion for Protective Order and Memorandum in Support pursuant to a protective agreement executed by FirstEnergy and IGS.

WHEREFORE, IGS respectfully requests that this Motion for Protective Order be granted for the reasons set forth herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph Olikar", written over a horizontal line.

Joseph Olikar (0086088)

Counsel of Record

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Attorney for IGS Energy

CERTIFICATE OF SERVICE

I certify that this Motion to For Protective Order and Memorandum in Support of IGS Energy was served electronically on the following parties on this 10th day of December, 2014.

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