

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application of</b>	)	
<b>Ohio Power Company to Adjust</b>	)	<b>Case No. 15-1400-EL-RDR</b>
<b>The Economic Development Cost</b>	)	
<b>Recovery Rider Rate</b>	)	

**MOTION FOR PROTECTIVE ORDER**

Ohio Power Company (“AEP Ohio” or the “Company”), pursuant to Rule 4901-1-24, Ohio Admin. Code, hereby moves the Commission for a protective order regarding information claimed by Eramet Marietta, Inc. (“Eramet”) and Globe Metallurgical, Inc. (“Globe”) to be confidential and proprietary which information is being included in the confidential/unredacted versions of Revised Schedules 2 and 2A supporting the application in this case, which contain confidential load data for the affected customers. These customers are expected to move for intervention in this case and file motions for protective orders for the similar data reflected in the original schedules filed in support of the Application.

## **MEMORANDUM IN SUPPORT**

As more fully explained in separate motions for protection anticipated to be filed by Eramet and Globe (collectively “the Customers”), the unredacted Revised Schedules 2, and 2A contain confidential and proprietary customer load information that merits protection from disclosure. The Company takes no position as to whether the customers’ load data is confidential and proprietary under Ohio law, but wanted to ensure that the Customers had a timely opportunity to seek protection. The Company also notes for the Commission’s full understanding that the load information relating to Ormet was included in the public version of the supporting Schedules because the Company has previously consulted with Ormet on numerous occasions relating to prior EDR filings and were always notified by Ormet that there was no need to redact the information or seek a protective order.

Respectfully submitted,

/s/ Steven T. Nourse

Steven T. Nourse

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**Counsel for Ohio Power Company**

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the Motion for Protection was served by electronic mail upon the individuals listed below this 3<sup>rd</sup> day of September, 2015.

/s// Steven T. Nourse

Steven T. Nourse

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Summary: Motion for Protective Order electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company