

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application Seeking</b>	)	
<b>Approval of Ohio Power Company's</b>	)	
<b>Proposal to Enter into an Affiliate</b>	)	<b>Case No. 14-1693-EL-RDR</b>
<b>Power Purchase Agreement for</b>	)	
<b>Inclusion in the Power Purchase</b>	)	
<b>Agreement Rider</b>	)	
	)	
<b>In the Matter of the Application of</b>	)	
<b>Ohio Power Company for Approval of</b>	)	<b>Case No. 14-1694-EL-AAM</b>
<b>Certain Accounting Authority</b>	)	

---

**MOTION FOR PROTECTIVE ORDER**  
**BY**  
**SIERRA CLUB**

---

Pursuant to Rule 4901-1-24, Ohio Administrative Code, Sierra Club respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a protective order for the confidentiality of portions of the Direct Testimony of Paul L. Chernick, including supporting exhibits, which were filed on September 11, 2015 in this proceeding. Sierra Club seeks this protective order for the reasons set forth in the attached Memorandum in Support.

Dated: September 11, 2015

Respectfully submitted,

/s/ Tony G. Mendoza  
Tony G. Mendoza  
Sierra Club  
85 Second Street, Second Floor  
San Francisco, CA 94105-3459  
Telephone: (415) 977-5589  
Fax: (415) 977-5793  
tony.mendoza@sierraclub.org

Kristin Henry (Counsel of Record)  
Sierra Club  
85 Second Street, 2nd Floor  
San Francisco, CA 94105  
(415) 977-5716  
kristin.henry@sierraclub.org

Richard C. Sahli (Ohio Bar #0007360)  
Richard Sahli Law Office, LLC  
981 Pinewood Lane  
Columbus, Ohio 43230-3662  
Telephone: (614) 428-6068  
rsahli@columbus.rr.com

Shannon Fisk  
Earthjustice  
1617 John F. Kennedy Blvd., Suite 1675  
Philadelphia, PA 19103  
(215) 717-4522  
sfisk@earthjustice.org

Michael Soules  
Earthjustice  
1625 Massachusetts Ave. NW, Suite 702  
Washington, DC 20036  
(202) 797-5237  
msoules@earthjustice.org

Attorneys for Sierra Club

**BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO**

<b>In the Matter of the Application Seeking</b>	)	
<b>Approval of Ohio Power Company's</b>	)	
<b>Proposal to Enter into an Affiliate</b>	)	<b>Case No. 14-1693-EL-RDR</b>
<b>Power Purchase Agreement for</b>	)	
<b>Inclusion in the Power Purchase</b>	)	
<b>Agreement Rider</b>	)	
	)	
<b>In the Matter of the Application of</b>	)	
<b>Ohio Power Company for Approval of</b>	)	<b>Case No. 14-1694-EL-AAM</b>
<b>Certain Accounting Authority</b>	)	

---

**MEMORANDUM IN SUPPORT**

---

Contemporaneous with this Motion, Sierra Club has filed the Direct Testimony of Paul L. Chernick, including supporting exhibits, with the Commission. Sierra Club has filed these papers in both a redacted form and in an unredacted form under seal. By this Motion, Sierra Club requests confidential treatment of the unredacted portions filed under seal. Ohio Power Company (the "Company") has designated information contained in these documents as confidential or competitively sensitive confidential and has produced the information subject to a protective agreement between the Company and Sierra Club. Sierra Club reserves the right to challenge 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 parties' protective agreement. Sierra Club respectfully requests that this Motion for Protective Order be granted for the reasons set forth herein.

Dated: September 11, 2015

Respectfully submitted,

/s/ Tony G. Mendoza

Tony G. Mendoza  
Sierra Club  
85 Second Street, Second Floor  
San Francisco, CA 94105-3459  
Telephone: (415) 977-5589  
Fax: (415) 977-5793  
tony.mendoza@sierraclub.org

Kristin Henry (Counsel of Record)  
Sierra Club  
85 Second Street, 2nd Floor  
San Francisco, CA 94105  
(415) 977-5716  
kristin.henry@sierraclub.org

Richard C. Sahli (Ohio Bar #0007360)  
Richard Sahli Law Office, LLC  
981 Pinewood Lane  
Columbus, Ohio 43230-3662  
Telephone: (614) 428-6068  
rsahli@columbus.rr.com

Shannon Fisk  
Earthjustice  
1617 John F. Kennedy Blvd., Suite 1675  
Philadelphia, PA 19103  
(215) 717-4522  
sfisk@earthjustice.org

Michael Soules  
Earthjustice  
1625 Massachusetts Ave. NW, Suite 702  
Washington, DC 20036  
(202) 797-5237  
msoules@earthjustice.org

Attorneys for Sierra Club

## CERTIFICATE OF SERVICE

I hereby certify that on this date I served a copy of the foregoing Motion for Protective Order by Sierra Club upon the following parties via electronic mail.

Date: September 11, 2015

/s/ Tony G. Mendoza

Tony G. Mendoza

## PERSONS SERVED

Allison@carpenterlipps.com Bojko@carpenterlipps.com cmooney@ohiopartners.org dboehm@BKLawfirm.com dwilliamson@spilmanlaw.com dstinson@bricker.com fdarr@mwncmh.com ghull@eckertseamans.com glpetrucci@vorys.com gthomas@gtpowergroup.com haydemn@firstenergycorp.com hussey@carpenterlipps.com jmcdermott@firstenergycorp.com jlang@calfee.com jeffrey.mayes@monitoringanalytics.com jkylercohn@BKLawfirm.com jfinnigan@edf.org joseph.clark@directenergy.com Jodi.bair@occ.ohio.gov joliker@igsenergy.com Kevin.moore@occ.ohio.gov Kurt.Helfrich@ThompsonHine.com Kyle.kern@occ.ohio.gov Larry.sauer@occ.ohio.gov laurac@chappelleconsulting.net lhawrot@spilmanlaw.com mdortch@kravitzllc.com mfleisher@elpc.org mhpeticoff@vorys.com Christopher.Miller@icemiller.com	myurick@taftlaw.com mfleisher@elpc.org mpritchard@mwncmh.com mjsatterwhite@aep.com msmalz@ohiopoverlylaw.org msmckenzie@aep.com mkurtz@BKLawfirm.com Michael.schuler@occ.ohio.gov mjsettineri@vorys.com msmalz@ohiopoverlylaw.org talexander@calfee.com ricks@ohanet.org sam@mwncmh.com Scott.Campbell@ThompsonHine.com scasto@firstenergycorp.com schmidt@sppgrp.com sasloan@aep.com Stephen.Chriess@walmart.com Stephanie.Chmiel@ThompsonHine.com steven.beeler@puc.state.oh.us stheodore@epsa.org stnourse@aep.com todonnell@dickinsonwright.com tobrien@bricker.com toddm@wamenergylaw.com tdougherty@theOEC.org werner.margard@puc.state.oh.us William.michael@occ.ohio.gov williamtwright@puc.state.oh.us dconway@porterwright.com  Attorney Examiners:
---	--

	<div>Sarah.Parrot@puc.state.oh.us</div> <div>Greta.see@puc.state.oh.us</div>
--	--

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

**Commission of Ohio Docketing Information System on**

**9/11/2015 2:40:21 PM**

**in**

**Case No(s). 14-1694-EL-AAM, 14-1693-EL-RDR**

Summary: Motion for Protective Order electronically filed by Mr. Tony G. Mendoza on behalf of Sierra Club