

6

FILE

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio)
 Edison Company, The Cleveland Electric)
 Company, and The Toledo Edison Company) Case No. 14-1297-EL-SSO
 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
 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 Second Supplemental Testimony of Tyler Comings, which was filed on October 13, 2015 in this proceeding. Sierra Club seeks this protective order for the reasons set forth in the attached Memorandum in Support.

Dated: October 13, 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

Richard C. Sahli (Ohio Bar #0007360)
 Richard Sahli Law Office, LLC

RECEIVED DOCKETING DIV
 2015 OCT 13 PM 12:25
 PUCO

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

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

Attorneys for Sierra Club

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

**In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric)
Company, and The Toledo Edison Company) Case No. 14-1297-EL-SSO
for Authority to Provide for a Standard Service)
Offer Pursuant to R.C. 4928.143 in the Form of)
An Electric Security Plan)**

MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, Sierra Club has filed the Second Supplemental Testimony of Tyler Comings with the Commission. Sierra Club has filed this testimony 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. The Ohio Edison Company, The Cleveland Electric Company, and The Toledo Edison Company (the “Companies”) have designated information contained in this testimony as confidential or competitively sensitive confidential and have produced the information subject to a protective agreement between the Companies 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: October 13, 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

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

Kristin Henry
Sierra Club
85 Second Street, 2nd Floor
San Francisco, CA 94105
(415) 977-5716
kristin.henry@sierraclub.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: October 13, 2015

s/ Michael C. Soules

Michael Soules

PERSONS SERVED

Thomas.mcnamee@puc.state.oh.us
Thomas.lindgren@puc.state.oh.us
Ryan.orourke@puc.state.oh.us
mkurtz@BKLawfirm.com
kboehm@BKLawfirm.com
jkylercohn@BKLawfirm.com
stnourse@aep.com
mjsatterwhite@aep.com
yalami@aep.com
joseph.clark@directenergy.com
ghull@eckertseamans.com
myurick@taftlaw.com
zkravitz@taftlaw.com
Schmidt@sppgrp.com
ricks@ohonet.org
tobrien@bricker.com
mkl@bbrslaw.com
gas@bbrslaw.com
ojk@bbrslaw.com
wttpmlc@aol.com
lhawrot@spilmanlaw.com
dwilliamson@spilmanlaw.com
Kevin.moore@occ.ohio.gov
sauer@occ.state.oh.us
leslie.kovacik@toledo.oh.gov
jscheaf@mcdonaldhopkins.com
marilyn@wflawfirm.com
matt@matthewcoxlaw.com
gkrassen@bricker.com
dborchers@bricker.com
mfleisher@elpc.org
selisar@mwncmh.com

sam@mwncmh.com
fdarr@mwncmh.com
mpritchard@mwncmh.com
cmooney@ohiopartners.org
joliker@igsenergy.com
mswhite@igsenergy.com
Bojko@carpenterlipps.com
Allison@carpenterlipps.com
hussey@carpenterlipps.com
barthroyer@aol.com
athompson@taftlaw.com
Christopher.miller@icemiller.com
Gregory.dunn@icemiller.com
Jeremy.grayem@icemiller.com
blanghenry@city.cleveland.oh.us
hmadorsky@city.cleveland.oh.us
kryan@city.cleveland.oh.us
tdougherty@theOEC.org
finnigan@edf.org
meissnerjoseph@yahoo.com
trhayslaw@gmail.com
TODonnell@dickinsonwright.com
dstinson@bricker.com
drinebolt@ohiopartners.org
mitch.dutton@fpl.com
Ccunningham@Akronohio.Gov
Jeanne.Kingery@dukeenergy.com
toddm@wamenergylaw.com
gthomas@gtpowergroup.com
stheodore@epsa.org
glpetrucci@vorys.com
gpoulos@enernoc.com

Amy.Spiller@duke-energy.com
jeffrey.mayes@monitoringanalytics.com
mhpetricoff@vorys.com
laurac@chappelleconsulting.net
mjsettineri@vorys.com
sechler@CarpenterLipps.com
cynthia.brady@constellation.com
lael.campbell@exeloncorp.com
tony.mendoza@sierraclub.org
burkj@firstenergycorp.com
cdunn@firstenergycorp.com
jlang@calfee.com
talexander@calfee.com
dakutik@jonesday.com

david.fein@constellation.com
asonderman@keglerbrown.com
msoules@earthjustice.org
mdortch@kravitzllc.com
rparsons@kravitzllc.com
ghiloni@carpenterlipps.com
callwein@keglerbrown.com
Ajay.kumar@occ.ohio.gov

-

Attorney Examiners:

Gregory.Price@puc.state.oh.us
Mandy.Chiles@puc.state.oh.us
Megan.Addison@puc.state.oh.us