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February 26, 2016

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PUCO

Docketing Division
Public Utilities Commission of Ohio
180 Broad Street, 11th Floor
Columbus, OH 43215
(614) 466-4095
docketing@puc.state.oh.us

Re: Case No. 14-1297-EL-SSO; Filing Post-Hearing Reply Brief of the Sierra Club

Dear Docketing Division Staff:

Enclosed please find for filing under seal unredacted copies of the Post-Hearing Reply Brief of the Sierra Club ("Brief") in Case No. 14-1297-EL-SSO. Sierra Club is filing the Brief under seal for two reasons. First, the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the "Companies") have designated some information contained in this Brief as confidential or competitively sensitive confidential and have produced the information to Sierra Club subject to a protective agreement. Second, Duke Energy Ohio, Inc. ("Duke") has designated some information contained in this Brief as confidential, and has produced the information to Sierra Club subject to a confidentiality agreement.

Contemporaneous with the filing under seal of the Brief, Sierra Club is filing a Motion for Protective Order to protect the confidentiality of information that the Companies and Duke have designated as confidential or competitively sensitive confidential. 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 pursuant to the protective agreement with the Companies, and the confidentiality agreement with Duke.

Please let me know if you have any questions.

Sincerely,



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This is to certify that the images appearing are an accurate and complete reproduction of a case file document delivered in the regular course of business.
Technician re Date Processed FEB 26 2016

**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 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)**

Case No. 14-1297-EL-SSO

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**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 Post-Hearing Reply Brief of the Sierra Club, which was filed on February 26, 2016, in this proceeding. Sierra Club seeks this protective order for the reasons set forth in the attached Memorandum in Support.

Dated: February 26, 2016

Respectfully submitted,



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Attorneys for Sierra Club

**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 Edison	)	
Company for Authority to Provide for a	)	Case No. 14-1297-EL-SSO
Standard Service Offer Pursuant to	)	
R.C. 4928.143 in the Form of An Electric	)	
Security Plan	)	

MEMORANDUM IN SUPPORT

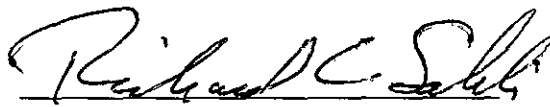
Contemporaneous with this Motion, Sierra Club has filed the Post-Hearing Reply Brief of the Sierra Club with the Commission. Sierra Club has filed this brief in both a redacted form and in an unredacted form under seal. By this Motion, Sierra Club requests confidential treatment of the unredacted portions filed under seal for two reasons.

First, the Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the "Companies") have designated information contained in this brief as confidential or competitively sensitive confidential and have produced the information subject to a protective agreement between the Companies and Sierra Club. Second, Duke Energy Ohio, Inc. has designated information contained in this brief as confidential, and has produced the information subject to a confidentiality agreement between Duke 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 protective agreement with the Companies, and the confidentiality agreement with Duke. Sierra Club respectfully requests that this Motion for Protective Order be granted for the reasons set forth herein.

Dated: February 26, 2016

Respectfully submitted,



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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: February 26, 2016

s/ Michael Soules

Michael Soules

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