

**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.)	

JOINT MOTION FOR PROTECTIVE ORDER

Pursuant to Rule 4901-1-24(D), Ohio Administrative Code, the PJM Power Providers Group (“P3”)¹ and the Electric Power Supply Association (“EPSA”)² file this joint motion for a protective order seeking confidential treatment of certain information referenced in the unredacted version of the Rehearing Testimony of Joseph P. Kalt, Ph.D., which is being filed this same day by P3 and EPSA. This joint motion seeks confidential treatment of information deemed confidential by Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company. The underlying reasons are detailed in the attached memorandum. Nothing, however, in this joint motion should be construed as P3’s and EPSA’s acquiescence or agreement that the designated information is confidential.

¹ P3 is a non-profit organization whose members are energy providers in the PJM Interconnection LLC (“PJM”) region, conduct business in the PJM balancing authority area, and are signatories to various PJM agreements. Altogether, P3 members own over 84,000 megawatts (“MWs”) of generation assets, produce enough power to supply over 20 million homes, and employ over 40,000 people in the PJM region, representing 13 states and the District of Columbia. This motion does not necessarily reflect the specific views of any particular member of P3 with respect to any argument or issue, but collectively presents P3’s positions.

² EPSA is a national trade association representing leading competitive power suppliers, including generators and marketers. Competitive suppliers, which collectively account for 40 percent of the installed generating capacity in the United States, provide reliable and competitively priced electricity from environmentally responsible facilities. EPSA seeks to bring the benefits of competition to all power customers. This motion does not necessarily reflect the specific views of any particular member of EPSA with respect to any argument or issue, but collectively presents EPSA’s positions.

Consistent with the above-cited rule, two unredacted copies of the Rehearing Testimony of Joseph P. Kalt, Ph.D., are being submitted under seal along with this joint motion.

Respectfully submitted,

s/ Michael J. Settineri

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**MEMORANDUM IN SUPPORT
OF THE JOINT MOTION FOR PROTECTIVE ORDER**

The PJM Power Providers Group (“P3”) and the Electric Power Supply Association (“EPSA”) respectfully request that certain information referenced in the Rehearing Testimony of Joseph P. Kalt, Ph.D., (namely, information from confidential portions of the hearing and exhibits) be protected from public disclosure. The information for which protection is sought describes and discusses or is derived from information that Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively “FirstEnergy”) have asserted is confidential and proprietary and would harm FirstEnergy if released to the public.

Accepting FirstEnergy’s claims of confidentiality and noting that the Attorney Examiners have afforded this information confidential treatment thus far warrant the granting of the requested protective order. The information referenced in the Rehearing Testimony of Joseph P. Kalt, Ph.D., was found by the Attorney Examiners to warrant confidential treatment earlier in this proceeding. Thus, the information referenced in the Rehearing Testimony of Joseph P. Kalt, Ph.D., may be maintained as confidential.

WHEREFORE, for the above reasons, P3 and EPSA respectfully request that the

Commission grant their joint motion for protective order and maintain under seal the designated portions of the Rehearing Testimony of Joseph P. Kalt, Ph.D.

Respectfully submitted,

s/ Michael J. Settineri

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio e-filing system will electronically serve notice of the filing of this document on the parties referenced in the service list of the docket card who have electronically subscribed to this case. In addition, the undersigned certifies that a courtesy copy of the foregoing document is also being served upon the persons below via electronic mail this 22nd day of June, 2016.

s/ Michael J. Settineri
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Summary: Motion - Joint Motion for Protective Order electronically filed by Mr. Michael J. Settineri on behalf of PJM Power Providers Group and Electric Power Supply Association