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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)

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 Sierra Club's Post-Hearing Reply Brief on Rehearing, filed on August 29, 2016, in this proceeding. Sierra Club seeks this protective order for the reasons set forth in the attached Memorandum in Support.

Dated: August 29, 2016

Respectfully submitted,



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 (PHV-1321-2016)
Earthjustice
1617 John F. Kennedy Blvd., Suite 1130
Philadelphia, PA 19103
(215) 717-4522
(212) 918-1556 (fax)
sfisk@earthjustice.org

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Michael C. Soules (PHV-5615-2016)
Earthjustice
1625 Massachusetts Ave. NW, Suite 702
Washington, DC 20036
(202) 797-5237
msoules@earthjustice.org

Tony G. Mendoza (PHV-5610-2016)
Sierra Club
Environmental Law Program
85 Second Street, Second Floor
San Francisco, CA 94105-3459
(415) 977-5589
tony.mendoza@sierraclub.org

Attorneys for Sierra Club

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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 with the Commission Sierra Club's Post-Hearing Reply Brief on Rehearing. 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. The Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (the "Companies") have designated information contained in the brief 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: August 29, 2016

Respectfully submitted,


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

Shannon Fisk (PHV-1321-2016)
Earthjustice
1617 John F. Kennedy Blvd., Suite 1130
Philadelphia, PA 19103
(215) 717-4522
(212) 918-1556 (fax)
sfisk@earthjustice.org

Michael C. Soules (PHV-5615-2016)
Earthjustice
1625 Massachusetts Ave. NW, Suite 702
Washington, DC 20036
(202) 797-5237
msoules@earthjustice.org

Tony G. Mendoza (PHV-5610-2016)
Sierra Club
Environmental Law Program
85 Second Street, Second Floor
San Francisco, CA 94105-3459
(415) 977-5589
tony.mendoza@sierraclub.org

Attorneys for Sierra Club

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing Motion for Protective Order by Sierra Club, along with a Memorandum in Support, has been served upon the following parties via electronic mail on August 29, 2016:

s/ Shannon Fisk

Shannon Fisk

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
zkravitz@taftlaw.com
Schmidt@sppgrp.com
ricks@ohanet.org
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
gkrassen@bricker.com
dborchers@bricker.com
mfleisher@elpc.org
selisar@mwncmh.com
Amy.Spiller@duke-energy.com
jeffrey.mayes@monitoringanalytics.com
laurac@chappelleconsulting.net
mjsettineri@vorys.com
sechler@CarpenterLipps.com
cynthia.brady@constellation.com
lael.campbell@exeloncorp.com
tony.mendoza@sierraclub.org

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
meissnerjoseph@yahoo.com
trhayslaw@gmail.com
TODonnell@dickinsonwright.com
dstinson@bricker.com
drinebolt@ohiopartners.org
Ccunningham@Akronohio.Gov
Jeanne.Kingery@dukeenergy.com
toddm@wamenergylaw.com
gthomas@gtpowergroup.com
stheodore@epsa.org
glpetrucci@vorys.com
gpoulos@enernoc.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
larry.sauer@occ.ohio.gov
maureen.willis@occ.ohio.gov
William.michael@occ.ohio.gov
Kevin.moore@occ.ohio.gov

cdunn@firstenergycorp.com
jlang@calfee.com
talexander@calfee.com
dakutik@jonesday.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

mkl@smxblaw.com
gas@smxblaw.com
rkelter@elpc.org
whitt@whitt-sturtevant.com
campbell@whitt-sturtevant.com
glover@whitt-sturtevant.com
mwarnock@bricker.com
kfield@elpc.org

Attorney Examiners:

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