

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Application of)	
The Toledo Edison Company)	Case No. 20-1645-EL-ATA
for Approval of a Tariff Change)	

**MOTION FOR PROTECTIVE ORDER
OF
THE OHIO CABLE TELECOMMUNICATIONS ASSOCIATION**

Pursuant to Ohio Adm.Code 4901-1-24(D), the Ohio Cable Telecommunications Association (“OCTA”) respectfully moves for a protective order seeking confidential treatment of certain information in Confidential Attachment A of the unredacted version of the OCTA’s Application for Rehearing, which is being filed this same day in this proceeding. This motion seeks confidential treatment of information that has been deemed confidential by The Toledo Edison Company. The underlying reasons are detailed in the attached memorandum. Nothing, however, in this motion should be construed as the OCTA’s acquiescence or agreement that the designated information is confidential.

Respectfully submitted,

/s/ Gretchen L. Petrucci

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MEMORANDUM IN SUPPORT

Ohio Adm.Code 4901-1-24(D) provides that the Public Utilities Commission of Ohio (“Commission”) or certain designated employees may issue an order to protect the confidentiality of information contained in documents filed with the Commission’s Docketing Division to the extent that state or federal law prohibits the release of the information and where non-disclosure of the information is not inconsistent with the purposes of Title 49 of the Revised Code.

The Ohio Cable Telecommunications Association (“OCTA”) respectfully requests that certain information referenced in its Application for Rehearing (namely, information on Confidential Attachment A) be protected from public disclosure. The information for which protection is sought is derived from information that The Toledo Edison Company (“TE”) has asserted is confidential and proprietary. Thus, the information referenced in OCTA’s Application for Rehearing should be maintained as confidential until such time as it is found to not be confidential.

WHEREFORE, the OCTA respectfully requests that the Commission maintain under seal the unredacted copy of Confidential Attachment A to its Application for Rehearing, unless the Commission finds that the information is not trade secret information.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The Public Utilities Commission of Ohio's e-filing system will electronically serve notice of the filing of this document on the parties referenced on the service list of the docket card who have electronically subscribed to the case. In addition, the undersigned hereby certifies that a copy of the foregoing document is also being served (via electronic mail) on the 28th day of January 2021 upon the persons listed below.

The Toledo Edison Company

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Staff of the Public Utilities Commission of Ohio

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/s/ Gretchen L. Petrucci

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Summary: Motion Motion for Protective Order electronically filed by Mrs. Gretchen L. Petrucci on behalf of Ohio Cable Telecommunications Association