

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Ohio)
Edison Company, The Cleveland Electric)
Illuminating Company, and The Toledo)
Edison Company's Compliance with R.C.)
4928.17 and Ohio Adm.Code Chapter)
4901:1-37.)

Case No. 17-974-EL-UNC

**MOTION FOR PROTECTIVE ORDER AND MEMORANDUM IN SUPPORT
OF INTERSTATE GAS SUPPLY, INC.**

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(Counsel willing to accept service by e-mail)

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MOTION FOR PROTECTIVE ORDER OF INTERSTATE GAS SUPPLY, INC.

Interstate Gas Supply, Inc. ("IGS") respectfully requests, in accordance with Ohio Adm.Code 4901-1-24, that the Public Utilities Commission of Ohio ("Commission") issue a Protective Order for the confidentiality of the Initial Comments of Interstate Gas Supply, Inc. ("Initial Comments") filed on November 22, 2021, in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Michael Nugent
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MEMORANDUM IN SUPPORT

Contemporaneous with this Motion, IGS has filed its Initial Comments in a redacted form, as well as filed an unredacted form under seal. By this Motion, IGS requests confidential treatment of the unredacted portions filed under seal of these Initial Comments.

Specifically, IGS requests confidential treatment of information filed under seal within the "Compliance Audit of the 2020 Delivery Capital Recovery (DCR) Riders of Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company and Expanded Scope" filed on August 3, 2021, in Case No. 20-1629-EL-RDR. Additionally, IGS has filed under seal certain information received from Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company (collectively, "FirstEnergy") through the discovery process. FirstEnergy has designated this information as confidential and competitively sensitive and produced the information subject to a protective agreement between FirstEnergy and IGS. IGS takes no position as to whether the information is a confidential trade secret under Ohio law, but files the Motion pursuant to a protective agreement executed by IGS and FirstEnergy.

Therefore, IGS respectfully requests confidential treatment of the redacted portions of its Initial Comments submitted in these proceedings.

Respectfully submitted,

/s/ Michael Nugent

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CERTIFICATE OF SERVICE

I certify that this *Motion for Protective Order and Memorandum in Support of Interstate Gas Supply, Inc.* was filed electronically with the Docketing Division of the Public Utilities Commission of Ohio on this November 22, 2021. The Commission's e-filing system will electronically serve notice of the filing of this document on the parties subscribed to this proceeding.

/s/ Evan Betterton
Evan Betterton

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Case No(s). 17-0974-EL-UNC

Summary: Motion for Protective Order electronically filed by Mr. Evan F. Betterton
on behalf of Interstate Gas Supply, Inc.