

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Power)
Purchase Agreement Rider of Ohio Power) Case No. 18-1004-EL-RDR
Company for 2018.)

In the Matter of the Review of the Power)
Purchase Agreement Rider of Ohio Power) Case No. 18-1759-EL-RDR
Company for 2019.)

**MOTION OF INDUSTRIAL ENERGY USERS-OHIO
FOR PROTECTIVE ORDER
AND MEMORANDUM IN SUPPORT**

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MARCH 18, 2022

COUNSEL FOR INDUSTRIAL ENERGY USERS-OHIO

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Pursuant to the provisions of Ohio Adm.Code 4901-1-24(D), Industrial Energy Users-Ohio (“IEU-Ohio”) respectfully requests that the Public Utilities Commission of Ohio (“Commission”) issue a Protective Order to maintain the confidentiality of the Industrial Energy Users-Ohio’s Initial Brief in this proceeding for the reasons set forth in the attached Memorandum in Support.

Respectfully submitted,

/s/ Matthew R. Pritchard

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MEMORANDUM IN SUPPORT

On March 18, 2022, IEU-Ohio filed the public version of its Initial Brief in this case. IEU-Ohio has also submitted the confidential version of its Initial Brief to the Commission in accordance with the Commission’s rules regarding confidential filings. By this Motion, IEU-Ohio requests confidential treatment of the confidential portions filed under seal. The confidential portion was designated as confidential information by the Independent Auditor and the information was produced subject to a protective agreement. IEU-Ohio takes no position as to 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 in order to maintain the confidentiality of the information identified as confidential in the Audit Report.

Respectfully submitted,

/s/ Matthew R. Pritchard
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CERTIFICATE OF SERVICE

In accordance with Ohio Adm.Code 4901-1-05, the PUCO's e-filing system will electronically serve notice of the filing of this document upon the following parties. In addition, I hereby certify that a service copy of the foregoing *Motion for Protective Order of Industrial Energy Users-Ohio* was sent by, or on behalf of, the undersigned counsel for Industrial Energy Users-Ohio, March 18, 2022.

/s/ Matthew Pritchard

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Case No(s). 18-1004-EL-RDR, 18-1759-EL-RDR

Summary: Motion for Protective Order electronically filed by Mr. Matthew R.
Pritchard on behalf of Industrial Energy Users-Ohio