

**BEFORE THE  
PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of Boyce Parker,	)	
	)	
Complainant,	)	
	)	
vs.	)	CASE NO. 21-0025-EL-CSS
	)	
The Cleveland Electric Illuminating	)	
Company,	)	
	)	
Respondent.	)	

**THE CLEVELAND ELECTRIC ILLUMINATING COMPANY’S MOTION FOR  
PROTECTIVE ORDER**

Pursuant to O.A.C. 4901-1-24(D), The Cleveland Electric Illuminating Company (“CEI”) moves for a protective order keeping confidential the information identified on Attachment A, which includes the following customer-specific information:

- Complainant Boyce Parker (“Complainant”)’s electric consumption history as detailed in his bills from CEI.

Ohio Adm. Code 4901:1-10-24(E) prohibits disclosure by an electric distribution utility of customer-specific information. A Memorandum in Support of this Motion is attached hereto and incorporated herein by reference.

Respectfully Submitted,

/s/ John W. Breig, Jr.

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*Counsel for The Cleveland Electric Illuminating  
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## **MEMORANDUM IN SUPPORT OF MOTION FOR PROTECTIVE ORDER**

The Cleveland Electric Illuminating Company (“CEI”) requests that the Commission protect from public disclosure the following customer-specific information, which is contained and/or referenced in the testimony of the CEI’s witness:

- Complainant Boyce Parker (“Complainant”)’s electric consumption history as detailed in his bills from CEI.

The referenced information is pertinent to the issues raised in this matter and is contained and/or referenced in the testimony of CEI’s witness Princess Davis. However, it is also the type of customer-specific information that CEI generally deems to be confidential.

Ohio law and the Commission’s rules provide for the protection of such confidential and proprietary information. Specifically, O.A.C. 4901-1-24(A) provides the Commission may issue:

[A]ny order which is necessary to protect a party or person from annoyance, embarrassment, oppression, or undue burden or expense. Such a protective order may provide that: . . .  
(7) A trade secret or other confidential research, development, commercial, or other information not be disclosed or be disclosed only in a designated way.

Pursuant to O.A.C. 4901-1-24(D), the Commission also may issue an order to protect the confidentiality of information contained in documents filed with the Commission 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. Here, the information CEI seeks to protect is customer-specific information that CEI generally deems to be confidential; thus, it warrants the Commission’s protection, and non-disclosure is not inconsistent with the purposes of Title 49. The Commission and its Staff will have full access to the information in order to fulfill their statutory obligations.

For the foregoing reasons, The Cleveland Electric Illuminating Company requests that the Commission protect from public disclosure the documents and information referenced in

Attachment A, which is contained in the pre-filed testimony of The Cleveland Electric Illuminating Company's witness Princess Davis.

Respectfully Submitted,

/s/ John W. Breig, Jr.

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## **ATTACHMENT A**

### Direct Testimony of Princess Davis

- Page 5, Line 19: Complainant's consumption during a billing period.
- Page 5, Line 20: Complainant's consumption during a billing period.
- Page 5, Line 21: Complainant's consumption during a billing period.
- Page 6, Line 1: Complainant's consumption during a billing period.
- Page 6, Line 9: Complainant's consumption during a billing period.
- Page 6, Line 12: Complainant's consumption during a billing period.
- Page 6, Line 13: Complainant's consumption during a billing period.
- Page 6, Line 14: Complainant's consumption during a billing period.
- Page 6, Line 15: Complainant's consumption during a billing period.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the forgoing Motion for Protective Order was filed electronically through the Docketing Information System of the Public Utilities Commission of Ohio on this 10th day of November 2022. A copy of the foregoing Motion was served by certified mail to the following person on this 10th day of November 2022:

Mr. Boyce Parker  
9505 St. Catherine Avenue  
Cleveland, OH 44104

/s/ John W. Breig, Jr.

John W. Breig, Jr. (0096767)

*One of the Attorneys for The Cleveland Electric  
Illuminating Company*

**This foregoing document was electronically filed with the Public Utilities  
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**Case No(s). 21-0025-EL-CSS**

Summary: Motion Motion for Protective Order electronically filed by Mr. John W.  
Breig on behalf of The Cleveland Electric Illuminating Company