

**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.

John W. Breig, Jr. (0096767)
BENESCH, FRIEDLANDER, COPLAN &
ARONOFF LLP
200 Public Square, Suite 2300
Cleveland, Ohio 44114-2378
Telephone: 216.363.4500
Facsimile: 216.363.4588
jbreig@beneschlaw.com

*Counsel for The Cleveland Electric Illuminating
Company*

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 CEI’s Initial Post-Hearing Brief:

- 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 CEI’s Initial Post-Hearing Brief. 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 initial post-hearing brief filed by The Cleveland Electric Illuminating Company.

Respectfully Submitted,

/s/ John W. Breig, Jr.

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BENESCH, FRIEDLANDER, COPLAN &
ARONOFF LLP
200 Public Square, Suite 2300
Cleveland, Ohio 44114-2378
Telephone: 216.363.4500
Facsimile: 216.363.4588
jbreig@beneschlaw.com

*Counsel for The Cleveland Electric Illuminating
Company*

ATTACHMENT A

CEI's Initial Post-Hearing Brief

- Page 6, Paragraph 3: 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 29th day of December 2022. A copy of the foregoing Motion was served by certified mail to the following person on this 29th day of December 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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in

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