

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric)
Illuminating Company and The Toledo)
Edison Company for Authority to Provide)
for a Standard Service Offer Pursuant to)
R.C. § 4928.143 in the Form of an)
Electric Security Plan)

PUCO Case No. 23-301-EL-SSO

**OHIO ENERGY LEADERSHIP COUNCIL'S
MOTION FOR PROTECTIVE ORDER**

Pursuant to the provisions of Rule 4901-1-24(D), Ohio Administrative Code (“O.A.C.”), Ohio Energy Leadership Council (“OELC”) respectfully requests that the Public Utilities Commission of Ohio (“Commission”) issue a protective order that provides that the unredacted version of the Direct Testimony of Matthew Brakey filed on behalf of OELC on October 23, 2023, in this proceeding remain under seal for the reasons set forth in the attached Memorandum in Support.

Dated: October 23, 2023

Respectfully submitted,

/s/ David F. Proaño

David F. Proaño (0078838)

Counsel of Record

Ali I. Haque (0087860)

Paul M. M. Willison (101355)

BAKER & HOSTETLER LLP

200 Civic Center Drive, Suite 1200

Columbus, OH 43215

216-861-7834 / Fax 216-696-0740

Email: dproano@bakerlaw.com

Email: ahaque@bakerlaw.com

Email: eprouty@bakerlaw.com

Email: pwillison@bakerlaw.com

Willing to Accept Service by Email

**COUNSEL FOR OHIO ENERGY
LEADERSHIP COUNCIL**

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Ohio)
Edison Company, The Cleveland Electric)
Illuminating Company and The Toledo)
Edison Company for Authority to Provide)
for a Standard Service Offer Pursuant to)
R.C. § 4928.143 in the Form of an)
Electric Security Plan)

PUCO Case No. 23-301-EL-SSO

**MEMORANDUM IN SUPORT OF OHIO ENERGY LEADERSHIP COUNCIL’S
MOTION FOR PROTECTIVE ORDER**

OELC has filed the Direct Testimony of Matthew Brakey in an unredacted form and under seal, which includes confidential Exhibits MB-1 and MB-2 and confidential customer name and load information in Table MB-7, which information has been designated by FirstEnergy as “confidential” in accordance with the terms of a Protective Order between FirstEnergy and OELC.

By this motion, OELC respectfully requests that the Commission issue an order that provides that the unredacted testimony with the confidential information and exhibits remain under seal. OELC has filed a redacted public version of Mr. Brakey’s testimony separately. OELC takes no position as to whether the redacted exhibits and information may be nonpublic information or information subject to public disclosure under Ohio law, but files this Motion for Protective Order and Memorandum in Support pursuant to a Protective Agreement executed by OELC and FirstEnergy.

PUCO Case No. 23-301-EL-SSO

WHEREFORE, OELC respectfully requests that this Motion for Protective Order be granted for the reasons set forth herein.

Dated: October 23, 2023

Respectfully submitted,

/s/ David F. Proaño

David F. Proaño (0078838)

Counsel of Record

Ali I. Haque (0087860)

Paul M. M. Willison (101355)

BAKER & HOSTETLER LLP

200 Civic Center Drive, Suite 1200

Columbus, OH 43215

216-861-7834 / Fax 216-696-0740

Email: dproano@bakerlaw.com

Email: ahaque@bakerlaw.com

Email: eprouy@bakerlaw.com

Email: pwillison@bakerlaw.com

Willing to Accept Service by Email

***COUNSEL FOR OHIO ENERGY
LEADERSHIP COUNCIL***

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing was served upon the persons listed below by email on this 23rd day of October 2023.

/s/David F. Proaño

David F. Proaño (0078838)

Counsel of Record

SERVICE LIST

mkurtz@BKLawfirm.com;
jkylercohn@BKLawfirm.com;
trhayslaw@gmail.com;
Leslie.kovackik@toledo.oh.gov;
cgrundmann@spilmanlaw.com;
dwilliamson@spilmanlaw.com;
slee@spilmanlaw.com;
bojko@carpenterlipps.com;
easley@carpenterlipps.com;
dstinson@brickergraydon.com;
gkrassen@nopec.org;
dparram@brickergraydon.com;
rmains@brickergraydon.com;
dborchers@brickergraydon.com;
kherrnstein@brickergraydon.com;
glpetrucci@vorys.com;
mjsettineri@vorys.com;
aasanyal@vorys.com;
Stacie.Cathcart@igs.com;
Michael.nugent@igs.com;
Evan.betterton@igs.com;
ahaque@bakerlaw.com;
eprouy@bakerlaw.com;
pwillison@bakerlaw.com;
john.finnigan@occ.ohio.gov;
keith.layton@occ.ohio.gov;
connor.semples@occ.ohio.gov;
rdove@keglerbrown.com;
nbobb@keglerbrown.com;
meissnerjoseph@yahoo.com;
little@litohio.com;
hogan@litohio.com;
todd.schafer@outlook.com;
jpetroff@lawforlabor.com;

jrb@smxblaw.com;
mkl@smxblaw.com;
jrb@sxblaw.com;
MKeaney@beneschlaw.com;
KHehmeyer@beneschlaw.com;
bknipe@firstenergycorp.com;
cwatchorn@firstenergycorp.com;
TAlexander@beneschlaw.com;
Paul@carpenterlipps.com;
Brian.gibbs@nationwideenergypartners.com;
dromig@nationwideenergypartners.com;
emcconnell@elpc.org;
trent@hubaydougherty.com;
mpritchard@mcneeslaw.com;
awalke@mcneeslaw.com;
cpirik@dickinsonwright.com;
todonnell@dickinsonwright.com;
kshimp@dickinsonwright.com;
knordstrom@theOEC.org;
ctavenor@theOEC.org;
ewoyt@vorys.com;
jdunn@oneenergylc.com;
ktreadway@oneenergylc.com;
thomas.lindgren@ohioago.gov;
Amy.BotschnerOBrien@OhioAGO.gov;
rhiannon.howard@ohioago.gov;
Christopher.Healey@puco.ohio.gov;
Natalia.Messenger@puco.ohio.gov;
Krystina.schaefer@puco.ohio.gov;
whitt@whitt-sturtevant.com;
jlang@calfee.com;
mbarbara@calfee.com;

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on
10/23/2023 2:41:05 PM**

in

Case No(s). 23-0301-EL-SSO

Summary: Motion Motion for Protective Order & Memorandum in Support Re Direct
Testimony of Matthew Brakey electronically filed by Mr. David F. Proano on behalf
of Ohio Energy Leadership Council (OELC), f/k/a Industrial Energy Users-Ohio.