

**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 |) | Case No. 23-301-EL-SSO |
| to Establish a Standard Service Offer |) | |
| Pursuant to §4928.143 Ohio Rev. Code, |) | |
| in the Form of an Electric Security Plan. |) | |

MOTION FOR PROTECTIVE ORDER

Pursuant to the provisions of Rule 4901-1-24(D), Ohio Administrative Code (“O.A.C.”), the Retail Energy Supply Association (“RESA”) respectfully requests that the Public Utilities Commission of Ohio (“Commission”) issue a protective order that provides that the unredacted version of the Initial Brief filed on behalf of RESA on January 19, 2024, in this proceeding remain under seal for the reasons set forth in the attached Memorandum in Support.

/s/ Matthew R. Pritchard

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(Counsel of Record)

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January 19, 2024

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MOTION FOR PROTECTIVE ORDER

Contemporaneous with this Motion, RESA has filed its Initial Brief. By this Motion, RESA requests confidential treatment for its Initial Brief as it references information disclosed by the Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company (collectively, "FirstEnergy") in discovery that FirstEnergy designated as confidential. RESA takes no position on if this information is, in fact, confidential. However, FirstEnergy has designated this information as confidential and competitively sensitive and said information was produced subject to a protective agreement executed by FirstEnergy and RESA. Further, the documents that disclosed the confidential information were discussed during a confidential portion of the hearing.

Again, RESA 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 a protective agreement executed by RESA and FirstEnergy.

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

Respectfully submitted,

/s/ Matthew R. Pritchard

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CERTIFICATE OF SERVICE

In accordance with Ohio Adm.Code 4901-1-05, the Commission's e-filing system will electronically serve notice of the filing of this document upon the interested parties, this 19th day of January 2024. The following parties were provided by electronic mail a copy of this document:

/s/ Matthew R. Pritchard

Matthew R. Pritchard

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Summary: Motion for Protective Order electronically filed by Mr. Matthew R.
Pritchard on behalf of Retail Energy Supply Association.