



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CAL

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Joint Application of Comcast Corporation, Time Warner Cable Inc., Time Warner Cable Information Services (California), LLC, and Bright House Networks Information Services (California), LLC for Expedited Approval of the Transfer of Control of Time Warner Cable Information Services (California), LLC (U-6874-C); and the Pro Forma Transfer of Control of Bright House Networks Information Services (California), LLC (U-6955-C), to Comcast Corporation Pursuant to California Public Utilities Code Section 854(a).

A. 14-04-013
(Filed April 11, 2014)

Joint Application of Comcast Corporation, Time Warner Cable Information Services (California), LLC, (U6874C) and Charter Fiberlink CA-CCO, LLC (U6878C) for Expedited Approval to Transfer Certain Assets and Customers of Charter Fiberlink CA-CCO, LLC to Time Warner Cable Information Services (California), LLC, Pursuant to Public Utilities Code Section 851.

A. 14-06-012
(Filed June 7, 2014)

**MOTION OF THE UTILITY REFORM NETWORK FOR LEAVE TO FILE UNDER
SEAL THE CONFIDENTIAL VERSION OF ITS REPLY BRIEF, OPENING
TESTIMONY, REPLY TESTIMONY, AND CERTAIN EXHIBITS;
[PROPOSED] ORDER**



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December 10, 2014

Pursuant to Rule 11.4 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure, The Utility Reform Network ("TURN") submits this motion for leave to file under seal the confidential version of its Reply Brief, Opening Testimony of Susan M. Baldwin, Reply Testimony of Susan M. Baldwin, and the following exhibit numbers: Confidential Exhibit SMB-1, 2, 3, 4, 9, 14, 15, 17, 18, 27, 29, 31, and 32, filed contemporaneously herewith. The confidential¹ versions of TURN's Reply Brief, Opening and Reply Testimony of Susan M. Baldwin, and above-referenced exhibits contain multiple references to information that Comcast Corporation, Time Warner Cable, Inc. or Time Warner Cable Information Services (California), LLC (U6874C)² claim is confidential and labeled as such. Throughout its reply brief and accompanying expert testimony, TURN marks the locations of the use of information that Comcast or Time Warner have claimed to be confidential as follows: **[BEGIN COMCAST CONFIDENTIAL]**; **[END COMCAST CONFIDENTIAL]**; **[BEGIN TWC CONFIDENTIAL]**; and **[END TWC CONFIDENTIAL]**.

While TURN has agreed to treat materials confidential that Joint Applicants have labeled accordingly, it is important to note that this simply means that TURN will not act unilaterally to disclose that information prior to submitting itself to the process of contesting the designation.

Affirmatively, TURN states that it does not waive its right to contest the confidentiality

¹ TURN is aware that Comcast Corporation ("Comcast"), Time Warner Cable, Inc., and Time Warner Cable Information Services (California), LLC (jointly, "Time Warner") have designated some documents and information as "highly confidential." Though an agreement has been reached concerning the disclosure and protection of the "highly confidential" documents and information, due to the timing of the briefing schedule, TURN, Comcast, and Time Warner have not yet determined the schedule for the training of TURN staff and experts on software for the production of the claimed "highly confidential" e-documents. Thus, TURN does not possess any documents labeled as "highly confidential" at this time and, therefore, TURN's Reply Brief, Opening Testimony, Reply Testimony, and Exhibits do not include any information or documents that Comcast or Time Warner have designated as "highly confidential."

² Charter Fiberlink CA-CCO, LLC (U6878C) ("Charter") and Bright House Networks Information Services (California), LLC (U6955C) ("Bright House") are also Joint Applicants in this proceeding. However, TURN does not reference confidential information of either Charter or Bright House in its Reply Brief, Opening Testimony, or Reply Testimony and TURN has not reproduced as an exhibit any information or documents that either has designated as confidential.

designation of any information or document so labeled by one or more of the Joint Applicants at a later time.

Thus, TURN here submits this motion to file under seal.

Date: December 10, 2014

Respectfully submitted,

By: /s/ William R. Nusbaum

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A. 14-06-012
(Filed June 7, 2014)

[PROPOSED] ORDER GRANTING THE UTILITY REFORM NETWORK TO FILE UNDER SEAL THE CONFIDENTIAL VERSION OF ITS REPLY BRIEF, OPENING TESTIMONY, REPLY TESTIMONY, AND CERTAIN EXHIBITS

On December 10, 2014, The Utility Reform Network (“TURN”) filed a Motion to File Under Seal (the “Motion”) seeking an order granting leave to file under seal its Reply Brief, Opening Testimony of Susan M. Baldwin, Reply Testimony of Susan M. Baldwin, and the following exhibits: Confidential Exhibit SMB-1, 2, 3, 4, 9, 14, 15, 17, 18, 27, 29, 31, and 32. In accordance with Rule 11.4 of the California Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, the Commission has considered TURN’s Motion,

and

Accordingly, it is **ORDERED** that TURN's Motion to File Under Seal is **GRANTED**.

Dated _____, at San Francisco, California.

Administrative Law Judge