
MEMORANDUM IN SUPPORT

Staff requests that the Commission keep both the Report of the Commission's Consultant Regarding FirstEnergy's January 2012 Standard Service Offer Auction and the Notification of CBP Auction Results confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the January 2012 FirstEnergy auction. This information is highly competitively sensitive. Public disclosure of this information would be highly prejudicial to the bidding parties and to the viability of any future auction in Ohio. Keeping this material confidential is consistent with the Commission's actions in prior auction matters. A redacted version of the Notification of CBP Auction Results has been filed publicly in this docket.

Respectfully submitted,

Thomas W. McNamee (Per authorization)

Thomas W. McNamee
Assistant Attorney General
Public Utilities Section
180 East Broad Street
Columbus, OH 43215-3793
614.466.4396 (telephone)
614.644.8764 (facsimile)
thomas.mcnamee@puc.state.oh.us

PROOF OF SERVICE

I certify that a true copy of the foregoing **Motion for a Protective Order and Memorandum in Support** submitted on behalf of the Staff of the Public Utilities Commission of Ohio was served by regular U.S. mail, postage prepaid, or via electronic mail, upon the following parties of record, this 25th day of January, 2012.

Thomas W. McNamee (per authentication)

Thomas W. McNamee
Assistant Attorney General

Parties of Record:

Samuel C. Randazzo
Joseph M. Clark
McNees Wallace & Nurick LLC
21 East State St., 17th Floor
Columbus, OH 43215
sam@mwncmh.com
jclark@mwncmh.com

Colleen L. Mooney
231 West Lima Street
PO Box 1793
Columbus, OH 43215
cmooney2@columbus.rr.com

Lance M. Keiffer
420 Madison Ave., Suite 100
Toledo, OH 43604-1219

Michael K. Lavanga
Brickfield, Burchette, Ritts & Stone
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, DC 20007-5201
mkl@bbrslaw.com

Nolan Moser
Bell & Royer, LPA
33 South Grant Avenue
Columbus, OH 43215
nmoser@theoec.org

Michael L. Kurtz
David F. Boehm
Boehm, Kurtz & Lowry
36 East Seventh Street, Suite 1510
Cincinnati, OH 45202
mkurtz@BKLlawfirm.com
dboehm@BKLlawfirm.com

Jeffrey L. Small
Gregory J. Poulos
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
10 West Broad Street
18th Floor
Columbus, OH 43215-3485
small@occ.state.oh.us
poulos@occ.state.oh.us
reese@occ.state.oh.us

Craig I. Smith
2824 Coventry Road
Cleveland, Ohio 44120
wis29@yahoo.com

Dane Stinson
Bailey Cavalieri LLC
10 West Broad Street, Suite 2100
Columbus, Ohio 43215
Dane.Stinson@BaileyCavalieri.com

Glenn S. Krassen
Matthew W. Warnock
Bricker & Eckler LLP
1375 E. 9th St., Suite 1500
Cleveland, OH 44114
gkrassen@bricker.com
mwarnock@bricker.com

M. Howard Petricoff
Vorys, Sater, Seymour and Pease, LLP
52 East Gay St.
PO Box 1008
Columbus, OH 43216-1008
mhpetricoff@vorys.com

Jacqueline Lake Roberts
Regulatory Affairs and Public Policy
101 Federal Street, Suite 1100
Boston, MA 02110
jroberts@enernoc.com

Teresa Ringenbach
5400 Frantz Rd., Suite 250
Dublin, OH 43016
teresa.ringenbach@directenergy.com

Richard L. Sites
155 E. Broad Street, 15th Floor
Columbus, OH 43215-3620
ricks@ohanet.org

Matthew S. White
Chester Wilcox & Saxbe, LLP
65 E. State St., Suite 1000
Columbus, OH 43215
mwhite@cwslaw.com

Theodore S. Robinson
2121 Murray Avenue
Pittsburgh, PA 15217
robinson@citizenpower.com

Michael D. Dortch
Kravitz, Brown & Dortch, LLC
63 E. State St., Suite 200
Columbus, OH 43215
mdortch@kravitzllc.com

George A. Yurchisin
FirstEnergy Service Company
76 S. Main St.
Akron, OH 44308
yurchisong@firstenergycorp.com

Michael E. Heintz
Staff Attorney
1207 Grandview Ave.
Suite 201
Columbus, Ohio 43212
mheintz@elpc.org

Eric D. Weldele
Tucker, Ellis & West, LLP
1225 Huntington Center
41 South High Street
Columbus, OH 43215-6197
eric.weldele@tuckerellis.com

James W. Burk
FirstEnergy Corp.
76 South Main Street
Akron, Ohio 44308
burkj@firstenergycorp.com

Gregory K. Lawrence
28 State Street
McDermott Will & Emory LLP
Boston, MA 02109
glawrence@mwe.com

Henry W. Eckhart
50 West Broad Street, #2117
Columbus, Ohio 43215
henryeckhart@aol.com

Amy Spiller
Duke Energy Business Services, Inc.
221 E. Fourth St., 25 Fl.
Cincinnati, OH 45202
amy.spiller@duke-energy.com

Cheri B. Cunningham
Director of Law
161 South High Street
Suite 202
Akron, OH 44308
ccunningham@akronohio.gov

David A. Kutik
Jones Day
901 Lakeside Avenue
Cleveland, OH 44114
dakutik@jonesday.com

Laura C. McBride
James F. Lang
Calfee, Halter & Griswold
1400 KeyBank Center
800 Superior Avenue
Cleveland, OH 44114
lmcbride@calfee.com

Mamie J. Mitchell
Cleveland City Council
601 Lakeside Avenue
Room 220
Cleveland, OH 44114

Joseph P. Meissner
Matthew D. Vincel
The Legal Aid Society of Cleveland
1223 West 6th Street
Cleveland, OH 44113
jpmeissn@lasclev.org

Steven Huhman
Morgan Stanley
2000 Westchester Ave.
Purchase, NY 10577
steven.huhman@morganstanley.com

Samuel A. Wolfe
100 W. Elm Street, Suite 410
Conshohocken, PA 19428

Christopher Miller
Andre T. Porter
Schottenstein Zox & Dunn Co., LPA
250 West St.
Columbus, OH 43215
cmiller@szd.com
aporter@szd.com

Meena T. Sinfelt
Andrews Kurth
1350 I Street, N.W.
Suite 1100
Washington, DC 20005

Robert Kelter
35 East Wacker Drive
Suite 1300
Chicago, IL 60613

Barbara Boyd
State Representative
77 South high Street, 11th Floor
Columbus, OH 43215-6111

Charles Faruki
D. Jeffrey Ireland
Faruki, Ireland & Cox
500 Courthouse Plaza, S.W.
10 North Ludlow Street
Dayton, OH 45402
cfaruki@ficlaw.com

F. Timothy Hagan, Commissioner
Cuyahoga County Board of County
Commissioners
1219 Ontario Street
Cleveland, OH 44113

Laura Chappelle
4218 Jacob Meadows
Okemos, MI 48864

Megan DeLisi
1207 Grandview Avenue
Suite 201
Columbus, OH 43212-3449

Roger Lindgren
Joe Mastervich
2669 Martin Luther King, Jr. Boulevard
Youngstown, OH 44510-1033

Charles R. Dyas, Jr.
Barnes & Thornburg
Fifth Third Center
21 East State Street
Suite 1850
Columbus, OH 43215-4219

Glen Thomas
1060 First Avenue
Suite 400
King of Prussia, PA 19406

Thomas Froehle
McNees Wallace & Nurick
21 East State Street, 17th Floor
Columbus, OH 43215-4228
tfroehle@mwncmh.com