BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Authority to Establish a Standard Service Offer Pursuant To Section 4928.143, Revised Code, in the Form of an Electric Security Plan	))))))	Case No. 11-346-EL-SSO Case No. 11-348-EL-SSO
In the Matter of the Application of Columbus Southern Power Company and Ohio Power Company for Approval of Certain Accounting Authority	))))	Case No. 11-349-EL-AAM Case No. 11-350-EL-AAM

OHIO POWER COMPANY'S
MOTION FOR RENEWAL OF PROTECTIVE ORDER

Ohio Power Company d/b/a AEP Ohio ("AEP Ohio" or the "Company"), pursuant to Rule 4901-1-24(F), Ohio Administrative Code, hereby moves the Commission to renew and extend its August 8, 2012, Opinion and Order ordering confidentiality treatment for, and prohibition against the disclosure of, certain information filed under seal in these dockets. The reasons supporting this motion are detailed in the accompanying memorandum in support.

Respectfully Submitted,

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MEMORANDUM IN SUPPORT

On May 2, 2012, AEP Ohio filed a motion for a protective order, seeking protective treatment of supplemental testimony and corresponding exhibits of AEP Ohio witness Nelson containing confidential and proprietary information relating to the Turning Point Solar project. On May 11, 2012, AEP Ohio filed an additional motion for a protective order to support the protection of confidential AEP Ohio information contained within IEU witness Murray, FES witness Lesser, and Exelon witness Fein's testimony. Finally, on the record during the evidentiary hearing in these proceedings on May 17, 2012, AEP Ohio also sought the continuation of protective treatment of exhibits attached to AEP Ohio witness Godfrey, as previously set forth in AEP Ohio's July 1, 2011, motion for a protective order. Tr. Vol. I. at 24.

In addition, on July 5, 2012, AEP Ohio filed a motion for a protective order over the items contained within Ormet and IEU's initial briefs, noting that they contain proprietary and trade secret information. On July 12, 2012, AEP Ohio filed a motion for a protective order in support of Ormet's July 9, 2012, motion for a protective order over items contained in the latter's reply brief, noting it contains AEP Ohio's confidential trade secret information.

At the evidentiary hearing on May 17, 2012, the attorney examiners granted the motions for protective order filed by AEP Ohio related to the information contained in the identified testimonies and exhibits, finding the information specified within AEP Ohio's motions constitutes confidential, proprietary, and trade secret information, and meets the requirements contained within Rule 4901-1-24(F), Ohio Admin. Code. *Id.* at 23-24. In its August 8, 2012, Opinion and Order, the Commission affirmed the attorney examiners' decision. Opinion and Order at 9 (Aug. 8, 2012). In its August 8, 2012, Opinion and Order, the Commission also affirmed protective treatment for the information contained within IEU and Ormet's initial brief

and Ormet's reply brief. *Id.* at 10. The confidential information was initially subject to a protective order for 18 months from the issuance of the Commission's August 8, 2012, Opinion and Order, until February 8, 2014.

The confidential information, previously found to be confidential, proprietary, and competitively sensitive by the attorney examiners and affirmed by the Commission, should remain confidential for an additional 18-month period from the expiration of the current order on February 8, 2014, until August 8, 2015. The information for which continued confidential treatment is requested includes highly confidential commercial terms of the Turning Point Solar agreement and revenue requirement; information related to the Company's offerings and bilateral transactions for capacity; information related to the findings of a confidential impairment analysis undertaken by the Company and discussed during a confidential session of the evidentiary hearing; and information related to fuel cost projections made by the Company. This confidential information is competitively sensitive and the Company takes steps to protect this information from disclosure. Further, public disclosure of this information would create significant disadvantages for AEP Ohio in future negotiations, and would give competitors inappropriate access to competitively sensitive business information about the Company.

For the foregoing reasons, AEP Ohio respectfully requests a renewal of the current protective order for an additional 18-month period, until August 8, 2015, and that any requests under the Open Records law for disclosure of the documents filed under seal in this proceeding be rejected under § 149.43(A)(a)(v), Revised Code, as a request for records whose release is prohibited under state law.

Respectfully submitted,

/s/ Yazen Alami

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served via electronic mail upon the individuals listed below on this 23rd day of December, 2013.

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Summary: Motion and Memorandum in Support for Renewal of Protective Order electronically filed by Mr. Yazen Alami on behalf of Ohio Power Company