BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of:Standard Service Offer Generation for:Customers of Ohio Power Company:

Case No. 15-792-EL-UNC

MOTION FOR A PROTECTIVE ORDER SUBMITTED ON BEHALF OF THE STAFF OF

THE PUBLIC UTILITIES COMMISSION OF OHIO

The Staff of the Public Utilities Commission of Ohio (Staff) requests that both the

Report of the Commission Consultant Regarding AEP Ohio's November 2015 Standard

Service Offer Auction and the Final Report of the Auction Manager, AEP Ohio CBP,

November 3, 2015 be kept confidential pursuant to O.A.C. Rule 4901-1-24 for the

reasons set forth in the attached memorandum in support.

Respectfully submitted,

/s/ Thomas G. Lindgren

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

On behalf of the Staff of the Public Utilities commission of Ohio

MEMORANDUM IN SUPPORT

Staff requests that the Commission keep both the Report of the Commission Consultant Regarding AEP Ohio's November 2015 Standard Service Offer Auction and the Final Report of the Auction Manager, AEP Ohio CBP, dated November 3, 2015 confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the November 2015 Ohio Power 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 Final Report of the Auction Manager, AEP Ohio CBP, dated November 3, 2015 has been filed publicly in this docket.

Respectfully submitted,

/s/<u>Thomas G. Lindgren</u>

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

On behalf of the Staff of the Public Utilities commission of Ohio

PROOF OF SERVICE

I certify that a true copy of the foregoing Motion for a Protective Order 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 4th day of November, 2015.

<u>/s/Thomas G. Lindgren</u> Thomas G. Lindgren

Assistant Attorney General

Parties of Record:

Steven T. Nourse American Electric Power Corp. 1 Riverside Plaza, 29th Floor Columbus, Ohio 43215 stnourse@aep.com

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Summary: Motion For A Protective Order filed on behalf of the Public Utilities Commission of Ohio. electronically filed by Mrs. Tonnetta Y Scott on behalf of PUCO