# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of :

Standard Service Offer Generation for : Case No. 15-792-EL-UNC

Customers of Ohio Power Company :

### 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 2016 Standard Service Offer Auction and the Final Report of the Auction Manager, AEP Ohio CBP, dated November 7, 2016 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 W. McNamee

#### Thomas W. McNamee

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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 2016 Standard Service Offer Auction and
the Final Report of the Auction Manager, AEP Ohio CBP, dated November 7, 2016 confidential and that they not be publicly released. This information identifies the details of
various bids and parties making the bids in the November 2016 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 7, 2016 has been filed publicly in this docket.

Respectfully submitted,

## /s/ Thomas W. McNamee

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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 9<sup>th</sup> day of November, 2016.

/s/ Thomas W. McNamee

**Thomas W. McNamee** Assistant Attorney General

#### **Parties of Record:**

Steven T. Nourse American Electric Power Corp. 1 Riverside Plaza, 29<sup>th</sup> Floor Columbus, OH 43215 stnourse@aep.com This foregoing document was electronically filed with the Public Utilities

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in

Case No(s). 15-0792-EL-UNC

Summary: Motion for Protective Order submitted by Assistant Attorney General Thomas McNamee on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio