

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Procurement of :  
Percentage of Income Payment Plan : Case No. 17-1163-EL-UNC  
Program Generation for Customers of :  
Dayton Power & Light Company. :

---

**MOTION FOR A PROTECTIVE ORDER  
SUBMITTED ON BEHALF OF THE STAFF OF  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

---

Comes now the Staff of the Public Utilities Commission of Ohio (Staff) and requests that both the Report of the Commission's Consultant Regarding Dayton Power & Lights 2017 PIPP RFP and the Notification of PIPP RFP Results 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**  
Assistant Attorney General  
Public Utilities Section  
30 East Broad Street, 16<sup>th</sup> Floor  
614.466.4396 (telephone)  
614.644.8764 (facsimile)  
[thomas.mcnamee@ohioattorneygeneral.gov](mailto:thomas.mcnamee@ohioattorneygeneral.gov)

**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's Consultant Regarding Dayton Power & Lights 2017 PIPP RFP and the Notification of PIPP RFP Results be kept confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the May 2017 PIPP RFP. 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 PIPP RFP Results has been filed publicly in this docket.

Respectfully submitted,

/s/ Thomas W. McNamee

**Thomas W. McNamee**  
Assistant Attorney General  
Public Utilities Section  
30 East Broad Street, 16<sup>th</sup> Floor  
614.466.4396 (telephone)  
614.644.8764 (facsimile)  
[thomas.mcnamee@ohioattorneygeneral.gov](mailto:thomas.mcnamee@ohioattorneygeneral.gov)

**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 via electronic mail upon the attached list, this 3<sup>rd</sup> day of May, 2017.

/s/ Thomas W. McNamee

**Thomas W. McNamee**  
Assistant Attorney General

### **Parties of Record:**

Dona Seger-Lawson  
Dayton Power & Light Company  
1065 Woodman Drive  
Dayton, OH 45432  
[dona.seger-lawson@dplinc.com](mailto:dona.seger-lawson@dplinc.com)

**This foregoing document was electronically filed with the Public Utilities**

**Commission of Ohio Docketing Information System on**

**5/3/2017 8:51:06 AM**

**in**

**Case No(s). 17-1163-EL-UNC**

Summary: Motion for a 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