# 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. 17-2391-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 March 2018 Standard

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

dated March 6, 2018 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 Columbus, OH 43215-3414 614.466.4396 (telephone) 614.644.8764 (facsimile) 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 Consultant Regarding AEP Ohio's March 2018 Standard Service Offer Auction and the Final Report of the Auction Manager, AEP Ohio CBP, dated March 6, 2018 confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the March 2018 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 March 6, 2018 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 Columbus, OH 43215-3414 614.466.4396 (telephone) 614.644.8764 (facsimile) 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 by regular U.S. mail, postage prepaid, or via electronic mail, upon the following parties of record, this 8<sup>th</sup> day of March, 2018.

/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 <u>stnourse@aep.com</u>

Attorney Examiners:

Sarah Parrot Greta See This foregoing document was electronically filed with the Public Utilities

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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