

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Procurement of	:	
Standard Service Offer Generation as Part	:	Case No. 16-0776-EL-UNC
of the Fourth Electric Security Plan for	:	
Customers of Ohio Edison Company, The	:	
Cleveland Electric Illuminating	:	
Company, and The Toledo Edison	:	
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 FirstEnergy's August 23, 2021 Standard Service Offer Auction and the Notification of CBP Auction 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,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 26th Floor
Columbus, OH 43215-3793
614.644.8768 (telephone)
614.557.0984 (fax)
Thomas.Lindgren@OhioAGO.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 FirstEnergy's August 23, 2021 Standard Service Offer Auction and the Notification of CBP Auction Results confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the August 23, 2021 FirstEnergy 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 Notification of CBP Auction Results has been filed publicly in this docket.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 26th Floor
Columbus, OH 43215-3793
614.644.8768 (telephone)
614.557.0984 (fax)
Thomas.Lindgren@OhioAGO.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 and Memorandum in Support**, submitted on behalf of the Staff of the Public Utilities Commission of Ohio, was served via electronic mail upon the following parties of record, this 25th day of August 2021.

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorney General

PARTIES OF RECORD:

Matthew R. Pritchard (Counsel of Record)

Rebekah J. Glover

McNees Wallace & Nurick LLC

21 East State Street, 17th Floor

Columbus, OH 43215

614.469.8000 (telephone)

614.469.4653 (fax)

mpritchard@mcneeslaw.com

rglover@mcneeslaw.com

Counsel for Industrial Energy Users-Ohio

N. Trevor Alexander

Mark T. Keaney

Kari D. Hehmeyer

Calfee, Halter & Griswold LLP

1200 Huntington Center

41 South High Street

Columbus, Ohio 43215

614.621.7774 (telephone)

614.621.0010 (fax)

talexander@calfee.com

mkeaney@calfee.com

khehmeyer@calfee.com

Counsel for Energy Harbor LLC

Robert M. Endris

FirstEnergy Service Company

76 South Main Street

Akron, OH 44308

330.384.5728 (telephone)

330.384.3875 (fax)

rendris@firstenergycorp.com

Michael J. Schuler

Dayton Power and Light Company

1065 Woodman Dr

Dayton Oh 45432

937.259.7358 (telephone)

michael.schuler@aes.com

Michael L. Kurtz

Kurt J. Boehm

Jody Kyler Cohn

Boehm, Kurtz & Lowry

36 East Seventh Street, Suite 1510

Cincinnati, Ohio 45202

mkurtz@bkllawfirm.com

kboehm@bkllawfirm.com

jkylercohn@bkllawfirm.com

Counsel for the Ohio Energy Group

Steven T. Nourse

American Electric Power Service
Corporation

1 Riverside Plaza, 29th Floor

Columbus, Ohio 43215

stnourse@aep.com

Counsel for Ohio Power Company

Joseph Olikier (Counsel of Record)

Michael Nugent

Bethany Allen

IGS Energy

6100 Emerald Parkway

Dublin, Ohio 43016

614.659.5000 (telephone)

michael.nugent@igs.com

joe.oliker@igs.com

bethany.allen@igs.com

Counsel for IGS Energy

Christopher Healey

William J. Michael

Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel

65 East State Street, 7th Floor

Columbus, Ohio 43215-4213

christopher.healey@occ.ohio.gov

william.michael@occ.ohio.gov

*Counsel for the Office of the Ohio
Consumers' Counsel*

Gretchen L. Petrucci

Vorys, Sater, Seymour And Pease LLP

52 East Gay Street P.O. Box 1008

Columbus, Ohio 43216-1008

glpetrucci@vorys.com

*Counsel for the Ohio Cable
Telecommunications Association*

Mark A. Whitt

Lucas A. Fykes

Whitt Sturtevant LLP

The KeyBank Building, Suite 1590

88 East Broad Street

Columbus, Ohio 43215

614.224.3946 (telephone)

614.675.9448 (fax)

whitt@whitt-sturtevant.com

fykes@whitt-sturtevant.com

*Counsel for Direct Energy Business,
LLC and Direct Energy Services, LLC*

Rocco O. D'Ascenzo

Deputy General Counsel

Jeanne W. Kingery

Associate General Counsel

Larisa M. Vaysman

Senior Counsel

Elizabeth Watts

Associate General Counsel

Duke Energy Business Services LLC

139 East Fourth Street, ML 1301

Cincinnati, Ohio 45202

614.222.1334 (telephone)

513.287.4385 (fax)

jeanne.kingery@duke-energy.com

rocco.dascenzo@duke-energy.com

larissa.vaysman@duke-energy.com

elizabeth.watts@duke-energy.com

Counsel for Duke Energy Ohio, Inc.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

8/25/2021 11:14:04 AM

in

Case No(s). 16-0776-EL-UNC

Summary: Motion for a Protective Order Submitted on Behalf of the Staff of the Public Utilities Commission of Ohio electronically filed by Mrs. Kimberly M. Naeder on behalf of PUCO