BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of :

Standard Service Offer Generation for : Case No. 17-957-EL-UNC

Customers of Dayton Power & Light

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's Consultant Regarding AES Ohio's March 22, 2022 Standard Service Offer Auction and the Notification of CBP Auction Results, dated March 22, 2022 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

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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's Consultant Regarding AES Ohio's March 22, 2022 Standard Service Offer Auction and the Notification of CBP Auction Results, dated March 22, 2022 confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the March 22, 2022 Dayton Power & Light's 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. Redacted versions of these documents have been filed publicly in this docket.

Respectfully submitted,

Dave Yost

Ohio Attorney General

John H. Jones

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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 23rd day of March, 2022.

/s/ Thomas Lindgren

Thomas Lindgren

Assistant Attorney General

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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