BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

:

In the Matter of the Procurement of Standard Service Offer Generation for Customers of Duke Energy Ohio, Inc.

: Case No. 18-6000-EL-UNC

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 Duke Energy Ohio's September 2022 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, Ohio 43215-3414 614.466.4395 (telephone) 614.644.8764 (facsimile) 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 Duke Energy Ohio's September 2022 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 September 2022 Duke Energy Ohio 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, Ohio 43215-3414 614.466.4395 (telephone) 614.644.8764 (facsimile) Thomas.Lindgren@OhioAGO.gov

On behalf of the Staff of the Public Utilities Commission of Ohio

PROOF OF SERVICE

I hereby 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 following parties of record, this 21st day of September 2022.

/s/ Thomas G. Lindgren Thomas G. Lindgren Assistant Attorney General

PARTIES OF RECORD:

N. Trevor Alexander Mark T. Keaney Kari D. Hehmeyer Benesch, Friedlander, Coplan & Aronoff LLP 41 South High Street, Suite 2600 Columbus, Ohio 43215-6164 614.223.9363 (telephone) 614.223.9330 (fax) slesser@beneschlaw.com mkeaney@beneschlaw.com Matthew R. Pritchard (Counsel of Record) McNees Wallace & Nurick LLC 21 East State Street, 17TH Floor Columbus, OH 43215 614.469.8000 (telephone) 614.469.4653 (fax) mpritchard@mcneeslaw.com

Counsel for Industrial Energy Users-Ohio

Counsel for Energy Harbor LLC

Steven T. Nourse (Counsel of Record) **Christen M. Blend** American Electric Power Service Corporation

1 Riverside Plaza, 29th Floor Columbus OH 43215 614.716.1608 (telephone) 614.716.2950 (fax) <u>stnourse@aep.com</u> cmblend@aep.com

Counsel for Ohio Power Company

Robert M. Endris FirstEnergy Service

FirstEnergy Service Company 76 S. Main St. Akron, OH 44308 330.3845.728 (telephone) 330.384.3875 (fax) rendris@firstenergycorp.com

Counsel for FirstEnergy Service Company

Rocco O. D'Ascenzo Deputy General Counsel Jeanne W. Kingery (Counsel of Record) Associate General Counsel Larisa M. Vaysman Senior Counsel Duke Energy Business Services LLC 139 East Fourth Street, ML 1301 Cincinnati, Ohio 45202 614.222.1334 (telephone) 513.287.4385 (fax) Rocco.DAscenzo@duke-energy.com Jeanne.Kingery@duke-energy.com Michael Kurtz Kurt Boehm Jody Kyler Cohn Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 513.421.2255 (telephone) 513.421.2764 (fax) mkurtz@BKLlawfirm.com kboehm@BKLlawfirm.com

Counsel for the Ohio Energy Group

Counsel for Duke Energy Ohio

Joseph Oliker Michael Nugent Bethany Allen IGS Energy 6100 Emerald Parkway Dublin, Ohio 43016 614.659.5000 (telephone) joe.oliker@igs.com michael.nugent@igs.com bethany.allen@igs.com

Counsel for Interstate Gas Supply, Inc.

Gretchen L. Petrucci

Vorys, Sater, Seymour and Pease 52 East Gay Street, P.O. Box 1008 Columbus OH 43216-1008 614.464.5407 (telephone) 614.719.4793 (fax) glpetrucci@vorys.com

William Michael

Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, 7th Floor Columbus, Ohio 43215 Telephone [Healey]: (614) 466-9571 Telephone [Michael]: (614) 466-1291 William.michael@occ.ohio.gov

Christopher Hollon

Dayton Power and Light Company 1065 Woodman Dr Dayton Oh 45432 937.259.7358 (telephone) 937.705.9804 (fax) Christopher.Hollon@aes.com

Counsel for The Dayton Power and Light Company

Mark A. Whitt

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

Counsel for Retail Energy Supply Association, Direct Energy Business, LLC, and Direct Energy Services, LLC

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/21/2022 9:18:43 AM

in

Case No(s). 18-6000-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