

**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.	:	

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

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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 March 20, 2023 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*

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**Thomas G. Lindgren**  
Assistant Attorney General  
Public Utilities Section  
30 East Broad Street, 26<sup>th</sup> Floor  
Columbus, OH 43215-3793  
614.644.8768 (telephone)  
614.557.0984 (fax)  
[Thomas.Lindgren@OhioAGO.gov](mailto:Thomas.Lindgren@OhioAGO.gov)

**On Behalf of the Staff of  
The Public Utilities Commission of Ohio**

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## **MEMORANDUM IN SUPPORT**

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Staff requests that the Commission keep both the Report of the Commission's Consultant Regarding FirstEnergy's March 20, 2023 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 March 20, 2023 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*

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**Thomas G. Lindgren**  
Assistant Attorney General  
Public Utilities Section  
30 East Broad Street, 26<sup>th</sup> Floor  
Columbus, OH 43215-3793  
614.644.8768 (telephone)  
614.557.0984 (fax)  
[Thomas.Lindgren@OhioAGO.gov](mailto: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 22<sup>nd</sup> day of March 2023.

/s/ Thomas G. Lindgren

**Thomas G. Lindgren**  
Assistant Attorney General

### **PARTIES OF RECORD:**

**Rocco O. D'Ascenzo**  
Deputy General Counsel  
**Jeanne W. Kingery**  
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)  
[jeanne.kingery@duke-energy.com](mailto:jeanne.kingery@duke-energy.com)  
[rocco.dascenzo@duke-energy.com](mailto:rocco.dascenzo@duke-energy.com)  
[larissa.vaysman@duke-energy.com](mailto:larissa.vaysman@duke-energy.com)

**Robert M. Endris**  
FirstEnergy Service Company  
76 South Main Street  
Akron, OH 44308  
330.384.5728 (telephone)  
330.384.3875 (fax)  
[rendris@firstenergycorp.com](mailto:rendris@firstenergycorp.com)

**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)  
[talexander@beneschlaw.com](mailto:talexander@beneschlaw.com)  
[mkeaney@beneschlaw.com](mailto:mkeaney@beneschlaw.com)  
[khehmeyer@beneschlaw.com](mailto:khehmeyer@beneschlaw.com)

*Counsel for Energy Harbor LLC*

**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](mailto:Christopher.Hollon@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](mailto:mkurtz@bkllawfirm.com)

[kboehm@bkllawfirm.com](mailto:kboehm@bkllawfirm.com)

[jkylercohn@bkllawfirm.com](mailto:jkylercohn@bkllawfirm.com)

*Counsel for the Ohio Energy Group*

**Steven T. Nourse**

American Electric Power Service  
Corporation

1 Riverside Plaza, 29<sup>th</sup> Floor

Columbus, Ohio 43215

[stnourse@aep.com](mailto:stnourse@aep.com)

*Counsel for Ohio Power Company*

**Joseph Olikier** (Counsel of Record)

**Michael Nugent**

IGS Energy

6100 Emerald Parkway

Dublin, Ohio 43016

614.659.5000 (telephone)

[michael.nugent@igs.com](mailto:michael.nugent@igs.com)

[joe.oliker@igs.com](mailto:joe.oliker@igs.com)

*Counsel for IGS Energy*

**William J. Michael**

**Maureen R. Willis**

**Connor Semple**

Assistant Consumers' Counsel

Office of the Ohio Consumers' Counsel

65 East State Street, 7<sup>th</sup> Floor

Columbus, Ohio 43215-4213

[william.michael@occ.ohio.gov](mailto:william.michael@occ.ohio.gov)

[maureen.willis@occ.ohio.gov](mailto:maureen.willis@occ.ohio.gov)

[connor.semple@occ.ohio.gov](mailto:connor.semple@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](mailto:glpetrucci@vorys.com)

*Counsel for the Ohio Cable  
Telecommunications Association*

**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](mailto:whitt@whitt-sturtevant.com)

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

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