

BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of	:	
Percentage of Income Payment Plan	:	Case No. 17-1163-EL-UNC
Program Generation for Customers of	:	
Dayton Power & Light 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 AES Ohio's April 2023 Percentage of Income Payment Plan RFP and the Notification of PIPP RFP 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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**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 April 2023 Percentage of Income Payment Plan RFP and the Notification of PIPP RFP Results be kept confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the April 2023 PIPP RFP. 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 PIPP RFP 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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Assistant Attorney General
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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 via electronic mail upon the attached list, this 19th day of April, 2023.

/s/ Thomas G. Lindgren

Thomas G. Lindgren

Assistant Attorney General

Parties of Record:

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**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

4/19/2023 9:55:17 AM

in

Case No(s). 17-1163-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.