# BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of

Standard Service Offer Generation for : Case No. 14-300-EL-UNC

Customers of Ohio Power 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 Consultant Regarding AEP Ohio's November 2014 Standard Service Offer Auction and the Final Report of the Auction Manager, AEP Ohio CBP - November 2014 Auction 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,

## /s/ Thomas W. McNamee

#### Thomas W. McNamee

Assistant Attorney General Public Utilities Section 180 East Broad Street Columbus, OH 43215-3793 614.466.4396 (telephone) 614.644.8764 (facsimile) thomas.mcnamee@puc.state.oh.us

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 Consultant Regarding AEP Ohio's November 2014 Standard Service Offer Auction and the Final Report of the Auction Manager, AEP Ohio CBP - November 2014 Auction be deemed confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the November 2014 Ohio Power 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 Final Report of the Auction Manager, AEP Ohio CBP - November 2014 Auction has been filed publicly in this docket.

Respectfully submitted,

# /s/ Thomas W. McNamee

Thomas W. McNamee
Assistant Attorney General
Public Utilities Section
180 East Broad Street
Columbus, OH 43215-3793
614.466.4396 (telephone)
614.644.8764 (facsimile)
thomas.mcnamee@puc.state.oh.us

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 20<sup>th</sup> day of November, 2014.

/s/ Thomas W. McNamee

Thomas W. McNamee Assistant Attorney General

#### **Parties of Record:**

Steven T. Nourse American Electric Power Corp. 1 Riverside Plaza, 29<sup>th</sup> Floor Columbus, Ohio 43215 <a href="mailto:strourse@aep.com">strourse@aep.com</a> This foregoing document was electronically filed with the Public Utilities

**Commission of Ohio Docketing Information System on** 

11/20/2014 9:27:21 AM

in

Case No(s). 14-0300-EL-UNC

Summary: Motion for a Protective Order filed by Assistant Attorney General Thomas McNamee on behalf of the Staff of the Public Utilities Commission of Ohio. electronically filed by Kimberly L Keeton on behalf of Public Utilities Commission of Ohio