# **BEFORE** THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of Standard:

Service Offer Generation for Customers of : Case No. 15-6000-EL-UNC

Duke Energy Ohio, Inc.

## 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 March 2016 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,

/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's Consultant Regarding Duke Energy Ohio's March 2016 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 2016 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,

/s/ Thomas W. McNamee

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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 \_\_\_\_ day of March, 2016.

/s/ Thomas W. McNamee

Thomas W. McNamee Assistant Attorney General

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

Elizabeth H. Watts Duke Energy Ohio, Inc. 155 East Broad Street Suite 2100 Columbus, OH 43215 elizabeth.watts@duke-energy.com This foregoing document was electronically filed with the Public Utilities

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Case No(s). 15-6000-EL-UNC

Summary: Motion for a Protective Order submitted 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