

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Procurement of :  
Standard Service Offer Generation as Part : Case No. 16-776-EL-UNC  
of the Fourth Electric Security Plan for :  
Customers of Ohio Edison Company, The :  
Cleveland Electric Illuminating :  
Company, and The Toledo Edison :  
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 FirstEnergy's April 2016 Standard Service Offer Auction and the Notification of SSO 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](mailto: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 FirstEnergy's April 2016 Standard Service Offer Auction and the Notification of SSO 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 April 13, 2016 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 SSO CBP Auction Results 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](mailto: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 and Memorandum in Support** submitted on behalf of the Staff of the Public Utilities Commission of Ohio was served via electronic mail upon applicant's counsel, James Burk, FirstEnergy Corporation, 76 South Main Street, Akron, Ohio, 44308, [burkj@firstenergycorp.com](mailto:burkj@firstenergycorp.com), this 14<sup>th</sup> day of April, 2016.

/s/ Thomas W. McNamee

**Thomas W. McNamee**  
Assistant Attorney General

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

**Commission of Ohio Docketing Information System on**

**4/14/2016 11:24:07 AM**

**in**

**Case No(s). 16-0776-EL-UNC**

Summary: Motion for 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