

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Procurement of	:	
Percentage of Income Payment Plan	:	Case No. 16-936-EL-UNC
Program Generation 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 May 2016 PIPP 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,

/s/ Thomas W. McNamee

**Thomas W. McNamee**  
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**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 May 2016 PIPP 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 May 2016 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,

/s/ Thomas W. McNamee

**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 via electronic mail upon the following parties of record, this 4<sup>th</sup> day of May, 2016.

/s/ Thomas W. McNamee

**Thomas W. McNamee**  
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### Parties of Record:

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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