BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of :

Standard Service Offer Generation as Part

of the Fourth Electric Security Plan for

Customers of Ohio Edison Company, The

Cleveland Electric Illuminating :

Company, and The Toledo Edison

Company.

Case No. 16-776-EL-UNC

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 January 31, 2017 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 FirstEnergy's January 31, 2017 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 January 31, 2017 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,

15/ 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 and Memorandum in Support**, submitted on behalf of the Staff of the Public Utilities Commission, was served via electronic mail on February 1, 2017, upon counsel for applicant, William R. Ridmann, FirstEnergy Corp., 76 South Main Street, Akron, Ohio, 44308, wrridmann@firstenergycorp.com.

/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

2/1/2017 11:01:05 AM

in

Case No(s). 16-0776-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