BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of Standard Service Offer Generation for Customers of Ohio Power Company

Case No. 15-792-EL-UNC

MOTION FOR A PROTECTIVE ORDER SUBMITTED ON BEHALF OF THE STAFF OF THE PUBLIC UTILITIES COMMISSION OF OHIO

The Staff of the Public Utilities Commission of Ohio (Staff) requests that both

the Report of the Commission Consultant Regarding AEP Ohio's March 2017 Standard

Service Offer Auction and the Final Report of the Auction Manager, AEP Ohio CBP,

dated March 28, 2017 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

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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 March 2017 Standard Service Offer Auction and the Final Report of the Auction Manager, AEP Ohio CBP, dated March 28, 2017 confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the March 2017 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, dated March 28, 2017 has been filed publicly in this docket.

Respectfully submitted,

/s/ Thomas W. McNamee

Thomas W. McNamee Assistant Attorney General Public Utilities Section 30 East Broad Street, 16th Floor Columbus, OH 43215-3414 614.466.4396 (telephone) 614.644.8764 (facsimile) thomas.mcnamee@ohioattorneygeneral.gov

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 29th day of March, 2017.

/s/ Thomas W. McNamee

Thomas W. McNamee Assistant Attorney General

Parties of Record:

Steven T. Nourse American Electric Power Corp. 1 Riverside Plaza, 29th Floor Columbus, OH 43215 <u>stnourse@aep.com</u>

Attorney Examiners:

Sarah Parrot Greta See This foregoing document was electronically filed with the Public Utilities

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in

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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