BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Procurement of :

Standard Service Offer Generation for : Case No. 17-957-EL-UNC

Customers of Dayton Power & Light :

Company

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's Consultant Regarding Dayton Power & Light's March 9, 2020 Standard Service Offer Auction and the Notification of CBP Auction Results, dated March 9, 2020 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,

Dave Yost

Ohio Attorney General

John H. Jones

Section Chief

15/ Thomas W. McNamee

Thomas W. McNamee

Assistant Attorney General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215-3414
614.466.4395 (telephone)
614.644.8764 (facsimile)
thomas.mcnamee@ohioattorneygeneral.gov

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 Dayton Power & Light's March 9, 2020 Standard Service Offer Auction and the Notification of CBP Auction Results, dated March 9, 2020 confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the March 9, 2020 Dayton Power & Light's 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. Redacted versions of these documents have been filed publicly in this docket.

Respectfully submitted,

Dave Yost

Ohio Attorney General

John H. Jones

Section Chief

15/ Thomas W. McNamee

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Assistant Attorney General Public Utilities Section 30 East Broad Street, 16th Floor Columbus, Ohio 43215-3414 614.466.4395 (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 10th day of March, 2020.

/s/Thomas W. McNamee

Thomas W. McNamee Assistant Attorney General

Parties of Record:

Michael J. Schuler
Eric R. Brown
The Dayton Power & Light Company
MacGregor Park
1065 Woodman Drive
Dayton, Ohio 45432
michael.schuler@aes.com
eric.brown@dplinc.com

Attorney Examiners:

Gregory Price Patricia Schabo Nicholas Walstra This foregoing document was electronically filed with the Public Utilities

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Case No(s). 17-0957-EL-UNC

Summary: Motion for a Protective Order Submitted on Behalf of the Staff of the Public Utilities Commission of Ohio electronically filed by Mrs. Kimberly M Naeder on behalf of PUCO