BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Application of the Generation Energy and Generation Capacity Riders of the Ohio Power Company

Case No. 20-943-EL-RDR

OHIO POWER COMPANY'S MOTION FOR PROTECTIVE ORDER

Ohio Power Company ("AEP Ohio" or the "Company"), pursuant to Rule 4901-1-24(D) of the Ohio Administrative Code, respectfully requests that the Public Utilities Commission of Ohio ("Commission") issue a protective order keeping confidential information redacted from the public version of the Generation Energy and Generation Capacity Riders filed on May 12, 2016. This information is contained on Schedule's 1, 3 & 5, and the redline tariff 497-1 supporting the application in this case.

These portions of the filing filed under seal contain confidential and proprietary competitively-sensitive information related to the Company's Percentage of Income Payment Plan (PIPP) auction price. The reasons supporting this motion are provided in the attached Memorandum in Support.

Respectfully submitted,

<u>/s/ Steven T. Nourse</u> Steven T. Nourse American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Columbus, Ohio 43215 (614) 716-1608 Fax: (614) 716-2950 Email: stnourse@aep.com

Counsel for Ohio Power Company

MEMORANDUM IN SUPPORT

Ohio Power Company ("AEP Ohio" or the "Company") requests that the Public Utilities Commission of Ohio ("Commission") issue a protective order keeping confidential the limited information redacted from the public version of the Generation Energy and Generation Capacity Riders filed on May 7, 2018 in this case. This information is contained on Schedule's 1, 3 & 5, and the redline tariffs supporting the application in this case and should be confidential in accordance with the Commission's prior orders on this subject. This information includes the name of the winning bidder and the winning auction price for the procurement of PIPP Program Generation for Customers of Ohio Power Company. Consistent with the Commission's April 10, 2019 Finding and Order in Case No. 16-1031-EL-UNC, a protective order should be issued covering the redacted materials.

Respectfully submitted,

<u>/s/ Steven T. Nourse</u> Steven T. Nourse American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Columbus, Ohio 43215 (614) 716-1608 Fax: (614) 716-2950 Email: stnourse@aep.com **Counsel for Ohio Power Company**

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Summary: Motion - Ohio Power Company's Motion for Protective Order electronically filed by Mr. Steven T Nourse on behalf of Ohio Power Company