BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

In the Matter of the Review of the

Power Purchase Agreement Rider of : Case No. 18-1004-EL-RDR

Ohio Power Company for 2018.

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 the Audit Report of the Ohio Valley Electric Company ("OVEC") Power Purchase Agreement Rider of Ohio Power Company for the time period of January 1, 2018, through December 31, 2019, 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

/s/ Kyle L. Kern

Kyle L. Kern

Thomas G. Lindgren

Assistant Attorneys General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215-3414
614.466.4395 (telephone)
866.431.4694 (facsimile)
Kyle.Kern@ohioattorneygeneral.gov
Thomas.Lindgren@ohioattorneygeneral.gov

On Behalf of the Staff of Public Utilities Commission of Ohio

MEMORANDUM IN SUPPORT

Staff requests that the Commission keep the Audit Report of the OVEC Power Purchase Agreement Rider of Ohio Power Company confidential and that it not be publicly released. There is financial information contained in the Audit Report highly that is sensitive in nature. Keeping this material confidential is consistent with the Commission's actions in prior auction matters as disclosure of this information to the public could be prejudicial. A redacted version of Audit Report of the OVEC Purchase Agreement Rider of Ohio Power Company for the time period of January 1, 2018, through December 31, 2019, has been filed publicly in this docket.

Respectfully submitted,

Dave Yost Ohio Attorney General

John H. Jones
Section Chief

/s/ Kyle L. Kern

Kyle L. Kern Thomas G. Lindgren

Assistant Attorneys General
Public Utilities Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215-3414
614.466.4395 (telephone)
866.431.4694 (facsimile)
Kyle.Kern@ohioattorneygeneral.gov

Thomas.Lindgren@ohioattorneygeneral.gov

On Behalf of the Staff of Public Utilities Commission of Ohio

CERTIFICATE OF SERVICE

I hereby 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 16th day of September 2020.

/s/ Kyle L. Kern

Kyle L. Kern

Assistant Attorney General

PARTIES OF RECORD:

Christopher Healey
Counsel of Record
William Michael
Assistant Consumers' Counsel
Office of the Ohio Consumers' Counsel
65 East State Street, 7th Floor
Columbus, Ohio 43215
Telephone [Healey]: 614.466.9571

Telephone [Michael]: 614.466.1291 christopher.healey@occ.ohio.gov william.michael@occ.ohio.gov **Steven T. Nourse**

Chief Ohio Regulatory Counsel Regulatory Services Telephone: 614.716.1608

Fax: 614.716.2014

stnourse@aep.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/16/2020 2:27:01 PM

in

Case No(s). 18-1004-EL-RDR

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