BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

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In the Matter of the Review of the Power Purchase Agreement Rider of Ohio Power Company for 2019.

Case No. 18-1759-EL-RDR

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/ Thomas G. Lindgren

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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/ Thomas G. Lindgren Thomas G. Lindgren Kyle L. Kern Assistant Attorneys General Public Utilities Section 30 East Broad Street, 16th Floor Columbus, Ohio 43215-3414 614.466.4395 (telephone) 866.431.4694 (facsimile) Thomas.Lindgren@ohioattorneygeneral.gov Kyle.Kern@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 17th day of September 2020.

/s/ Thomas G. Lindgren

Thomas G. Lindgren Assistant Attorney General

PARTIES OF RECORD:

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Case No(s). 18-1759-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