

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Procurement of	:	
Standard Service Offer Generation as Part	:	Case No. 16-0776-EL-UNC
of the Fourth Electric Security Plan for	:	
Customers of Ohio Edison Company, The	:	
Cleveland Electric Illuminating	:	
Company, and The Toledo Edison	:	
Company.	:	

**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 both the Report of the Commission's Consultant Regarding FirstEnergy's October 4, 2021 Standard Service Offer Auction and the Notification of CBP Auction Results 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

Thomas G. Lindgren

Assistant Attorney General

Public Utilities Section

180 East Broad Street, 26th Floor

Columbus, OH 43215-3793

614.644.8768 (telephone)

614.557.0984 (fax)

Thomas.Lindgren@OhioAGO.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 FirstEnergy's October 4, 2021 Standard Service Offer Auction and the Notification of CBP Auction Results confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the October 4, 2021 FirstEnergy 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 Notification of CBP Auction Results 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
Assistant Attorney General
Public Utilities Section
180 East Broad Street, 26th Floor
Columbus, OH 43215-3793
614.644.8768 (telephone)
614.557.0984 (fax)
Thomas.Lindgren@OhioAGO.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 and Memorandum in Support**, 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 6th day of October 2021.

/s/ Thomas G. Lindgren

Thomas G. Lindgren
Assistant Attorney General

PARTIES OF RECORD:

<p>Matthew R. Pritchard (Counsel of Record) Rebekah J. Glover McNees Wallace & Nurick LLC 21 East State Street, 17th Floor Columbus, OH 43215 614.469.8000 (telephone) 614.469.4653 (fax) mpritchard@mcneeslaw.com rglover@mcneeslaw.com</p> <p><i>Counsel for Industrial Energy Users-Ohio</i></p>	<p>N. Trevor Alexander Mark T. Keaney Kari D. Hehmeyer Benesch, Friedlander, Coplan & Aronoff, LLP 41 South High Street, Suite 2600 Columbus, Ohio 43215-6164 Direct Dial: 614.223.9363 Fax: 614.223.9330 talexander@beneschlaw.com mkeaney@beneschlaw.com khehmeyer@beneschlaw.com</p> <p><i>Counsel for Energy Harbor LLC</i></p>
<p>Emily V. Danford FirstEnergy Service Company 76 South Main Street Akron, OH 44308 330.384.5849 (telephone) edanford@firstenergycorp.com</p> <p><i>Attorney for Ohio Edison Company, The Cleveland Electric Illuminating Company, and The Toledo Edison Company</i></p>	<p>Michael J. Schuler Dayton Power and Light Company 1065 Woodman Dr Dayton Oh 45432 937.259.7358 (telephone) michael.schuler@aes.com</p>

<p> Michael L. Kurtz Kurt J. Boehm Jody Kyler Cohn Boehm, Kurtz & Lowry 36 East Seventh Street, Suite 1510 Cincinnati, Ohio 45202 mkurtz@bkllawfirm.com kboehm@bkllawfirm.com jkylercohn@bkllawfirm.com <i>Counsel for the Ohio Energy Group</i> </p>	<p> Christopher Healey William J. Michael Assistant Consumers' Counsel Office of the Ohio Consumers' Counsel 65 East State Street, 7th Floor Columbus, Ohio 43215-4213 christopher.healey@occ.ohio.gov william.michael@occ.ohio.gov <i>Counsel for the Office of the Ohio Consumers' Counsel</i> </p>
<p> Steven T. Nourse American Electric Power Service Corporation 1 Riverside Plaza, 29th Floor Columbus, Ohio 43215 stnourse@aep.com <i>Counsel for Ohio Power Company</i> </p>	<p> Gretchen L. Petrucci Vorys, Sater, Seymour And Pease LLP 52 East Gay Street P.O. Box 1008 Columbus, Ohio 43216-1008 glpetrucci@vorys.com <i>Counsel for the Ohio Cable Telecommunications Association</i> </p>
<p> Joseph Olikier (Counsel of Record) Michael Nugent Bethany Allen IGS Energy 6100 Emerald Parkway Dublin, Ohio 43016 614.659.5000 (telephone) michael.nugent@igs.com joe.oliker@igs.com bethany.allen@igs.com <i>Counsel for IGS Energy</i> </p>	<p> Mark A. Whitt Lucas A. Fykes Whitt Sturtevant LLP The KeyBank Building, Suite 1590 88 East Broad Street Columbus, Ohio 43215 614.224.3946 (telephone) 614.675.9448 (fax) whitt@whitt-sturtevant.com fykes@whitt-sturtevant.com <i>Counsel for Direct Energy Business, LLC and Direct Energy Services, LLC</i> </p>

Rocco O. D'Ascenzo

Deputy General Counsel

Jeanne W. Kingery

Associate General Counsel

Larisa M. Vaysman

Senior Counsel

Elizabeth Watts

Associate General Counsel

Duke Energy Business Services LLC

139 East Fourth Street, ML 1301

Cincinnati, Ohio 45202

614.222.1334 (telephone)

513.287.4385 (fax)

jeanne.kingery@duke-energy.com

rocco.dascenzo@duke-energy.com

larissa.vaysman@duke-energy.com

elizabeth.watts@duke-energy.com

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

10/6/2021 11:24:03 AM

in

Case No(s). 16-0776-EL-UNC

Summary: Motion for Protective Order electronically filed by Mrs. Tonnetta Y. Scott on behalf of PUCO