

**BEFORE  
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Review of the Power	)	
Purchase Agreement Rider of Ohio	)	Case No. 18-1004-EL-RDR
Power Company for 2018.	)	

In the Matter of the Review of the Power	)	
Purchase Agreement Rider of Ohio	)	Case No. 18-1759-EL-RDR
Power Company for 2019.	)	

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**MEMORANDUM CONTRA MOTION OF AEP FOR PROTECTIVE ORDER  
BY  
OFFICE OF THE OHIO CONSUMERS' COUNSEL**

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AEP has moved to keep confidential (from the public) the September 1, 2020 draft report of the Auditor hired by the Public Utilities Commission of Ohio (“PUCO”). This matter is straightforward. AEP has failed to satisfy O.A.C. 4901-1-24(D).

Under this Rule, the PUCO is required to “minimize” the information to be protected. And AEP is required to limit redactions to information that is “essential to prevent disclosure of the allegedly confidential information.”

The PUCO would know from the information in the public record of this case that AEP, with its board-brush approach, has failed to follow the Rule. AEP’s motion for protection should be denied.



Respectfully submitted,

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Ohio Consumers' Counsel

/s/ John Finnigan

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## **CERTIFICATE OF SERVICE**

It is hereby certified that a true copy of the foregoing Memorandum Contra Motion of AEP for Protective Order was served upon the persons listed below by electronic transmission this 1<sup>st</sup> day of April 2022.

/s/ John Finnigan  
John Finnigan  
Assistant Consumers' Counsel

The PUCO's e-filing system will electronically serve notice of the filing of this document on the following parties:

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**Case No(s). 18-1004-EL-RDR, 18-1759-EL-RDR**

Summary: Memorandum Memorandum Contra Motion of AEP for Protective Order  
by Office of the Ohio Consumers' Counsel electronically filed by Ms. Alana M.  
Noward on behalf of Finnigan, John