

**BEFORE
THE PUBLIC UTILITIES COMMISSION OF OHIO**

In the Matter of the Procurement of	:	
Percentage of Income Payment Plan	:	Case No. 16-1031-EL-UNC
Program Generation for Customers of	:	
Ohio Power 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 AEP Ohio's May 2022 Supplemental PIPP RFP and the Notification of Auction Results under AEP Ohio's PIPP RFP 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
30 East Broad Street, 26th Floor
Columbus, Ohio 43215-3414
614.644.8539 (telephone)
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 AEP Ohio's May 2022 Supplemental PIPP RFP and the Notification of Auction Results under AEP Ohio's PIPP RFP be kept confidential and that they not be publicly released. This information identifies the details of various bids and parties making the bids in the May 2022 PIPP RFP. 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 Auction Results under AEP Ohio's PIPP RFP has been filed publicly in this docket.

Respectfully submitted,

Dave Yost
Ohio Attorney General

John H. Jones
Section Chief

/s/ Thomas G. Lindgren

Thomas Lindgren
Assistant Attorney General
Public Utilities Section
30 East Broad Street, 26th Floor
Columbus, Ohio 43215-3414
614.644.8539 (telephone)
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** submitted on behalf of the Staff of the Public Utilities Commission of Ohio was served via electronic mail upon the attached list, this 4th day of May, 2022.

/s/ Thomas G. Lindgren

Thomas Shepherd

Assistant Attorney General

Parties of Record:

Steven T. Nourse

AEP Ohio

1 Riverside Plaza, 29th Floor

Columbus, OH 43215

stnourse@aep.com

Applicant's Counsel

**This foregoing document was electronically filed with the Public Utilities
Commission of Ohio Docketing Information System on**

5/4/2022 1:50:31 PM

in

Case No(s). 16-1031-EL-UNC

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