# THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Kansas	)
Gas Service, a Division of ONE Gas, Inc.	) Docket No. 15-KGSG-088-TAR
for Approval by the Commission for a Gas	<b>)</b> (*)
System Reliability Surcharge per K.S.A. 66-	)
2201 through 66-2204.	)

## **CURB'S MOTION FOR PROTECTIVE ORDER & DISCOVERY ORDER**

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB"), hereby moves the Corporation Commission of the State of the Kansas ("Commission") for an issuance of a Protective Order and Discovery Order in the above-captioned proceeding.

- 1. On August 25, 2014, Kansas Gas Service, a Division on ONE Gas, Inc. (Kansas Gas Service) filed an application with the Kansas Corporation Commission for approval of a Gas System Reliability Surcharge per K.S.A. 66-2201 through 66-2204.
- 2. On September 16, 2014 the Commission granted CURB intervention in the above mentioned docket.
- 3. It is likely that certain information provided to the Commission or its Staff in this investigation might be claimed as, or considered, confidential.

WHEREFORE, CURB RESPECTFULLY REQUESTS THAT the Commission issue the requested Protective Order and Discovery Order in this docket.

Respectfully submitted,

David Springe #15619

Niki Christopher #19311 Citizens' Utility Ratepayer Board

1500 SW Arrowhead Road

Topeka, KS 66604

(785) 271-3200

(785) 271-3116 Fax

### **VERIFICATION**

STATE OF KANSAS	)	
	)	ss:
COUNTY OF SHAWNEE	)	

I, Niki Christopher, of lawful age and being first duly sworn upon my oath, state that I am an attorney for the Citizens' Utility Ratepayer Board; that I have read and am familiar with the above and foregoing document and attest that the statements therein are true and correct to the best of my knowledge, information, and belief.

Niki Christopher

SUBSCRIBED AND SWORN to before me this 9<sup>th</sup> day of October, 2014.

Notary Public

DELLA J. SMITH

Notary Public - State of Kansas
My Appt. Expires January 26, 2017

My Commission expires: 01-26-2017.

#### CERTIFICATE OF SERVICE

#### 15-KGSG-088-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 9<sup>th</sup> day of October, 2014, to the following:

SAMUEL FEATHER, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 <a href="mailto:s.feather@kcc.ks.gov">s.feather@kcc.ks.gov</a>

WALKER HENDRIX, DIRECTOR, REG LAW KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC. 7421 W 129TH ST OVERLAND PARK, KS 66213-2634 whendrix@oneok.com

JOHN P. DECOURSEY, DIRECTOR, LAW KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC. 7421 W 129TH ST OVERLAND PARK, KS 66213-2634

John.decoursey@kansasgasservice.com

DAVID N. DITTEMORE, MANAGER OF RATES & ANALYSIS KANSAS GAS SERVICE, A DIVISION OF ONE GAS, INC. 7421 W 129TH ST OVERLAND PARK, KS 66213-2634 David.dittemore@oneok.com

Della Smith

Administrative Specialist