

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

Received
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In the Matter of the Complaint of Southern)
Pioneer Electric Company Against the Kansas)
Power Pool Regarding Bypass and Duplication)
of Service for 34.5kV Delivery to the City of)
Kingman.

by
State Corporation Commission
of Kansas

Docket No. 17-KPPE-092-COM

MOTION FOR PROTECTIVE AND DISCOVERY ORDERS

COMES NOW Southern Pioneer Electric Company (“Southern Pioneer” or “Complainant”) and hereby moves the State Corporation Commission of the State of Kansas (“Commission” or “KCC”) to issue a Protective Order and a Discovery Order in this docket. In support of its motion, Southern Pioneer states:

1. Simultaneously with the filing of this motion, Southern Pioneer filed a formal complaint against Kansas Power Pool (KPP) seeking relief from the Commission to prevent the bypass and duplication of service of certain Southern Pioneer 34.5 kV delivery assets (Complaint). Some of the information contained in the filing is confidential, proprietary and/or commercially sensitive material, as defined in K.S.A. 66-1220a, and K.A.R. 82-1-221a..

2. Southern Pioneer anticipates that the parties will need to conduct discovery in this matter and that some of the responses to discovery may contain confidential information. Therefore, Southern Pioneer requests that the Commission issue both a protective and discovery order to govern this proceeding, in order to protect Southern Pioneer and other parties in this docket from disclosure of sensitive, proprietary, and highly confidential information, and to facilitate the investigation of this matter.

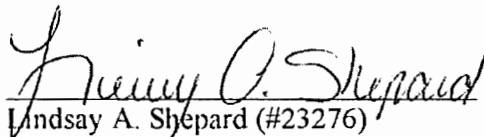
3. Southern Pioneer submits that the interest in maintaining the confidential status of qualifying material and avoiding the harm that otherwise would result to the parties outweighs

any interest in disclosing the material to unauthorized parties or in proceedings unrelated to the Complaint. For these reasons, Southern Pioneer requests that the Commission issue its standard Protective Order in this proceeding. For these same reasons, Southern Pioneer requests the Commission issue a Discovery Order in this proceeding. Southern Pioneer requests that the Discovery Order clearly state that for purposes of calculating discovery-related deadlines that Saturdays, Sundays, and legal holidays be excluded.¹

4. A Protective and Discovery Order will enable the Commission to manage the discovery process in a manner that furthers the goal of full disclosure of relevant, non-sensitive information, while at the same time protecting participants from harm that could result from the unregulated disclosure of commercially-sensitive information.

WHEREFORE, Southern Pioneer respectfully requests that the Commission issue the requested Protective and Discovery Orders and that the said Orders apply to all parties in this proceeding.

Respectfully submitted,



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¹ Docket No. 16-KCPE-593-ACQ, *In the Matter of the Joint Application of Great Plains Energy Incorporated, Kansas City Power & Light Company and Westar Energy, Inc. for approval of the Acquisition of Westar Energy, Inc. by Great Plains Energy Incorporated*, Order Granting in Part, Denying in Part Joint Applicants' Petition for Reconsideration of Discovery Order, ¶B, issued Aug. 25, 2016.

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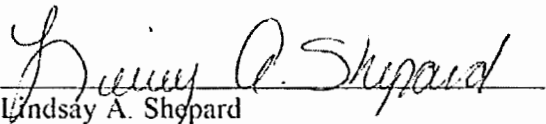
**COUNSEL FOR SOUTHERN PIONEER
ELECTRIC COMPANY**

VERIFICATION

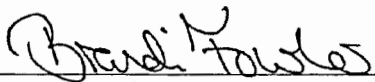
STATE OF KANSAS)
)
COUNTY OF GRANT) ss:

Lindsay A. Shepard, of lawful age, being first duly sworn on oath states:

That she is counsel for Southern Pioneer Electric Company; that she has read the foregoing motion and knows the contents thereof; and that the facts therein are true and correct to the best of her knowledge, information, and belief.


Lindsay A. Shepard

SUBSCRIBED AND SWORN to before me this 6th, day of September, 2016.


Notary Public

My Commission expires: 12/3/16

