

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of Atmos Energy)
Corporation for Authority to Cease Transacting) Docket No. 22-ATMG-039-CCS
the Business of a Natural Gas Public Utility in a)
Portion of Leavenworth County, Kansas.)

MOTION FOR DISCOVERY AND PROTECTIVE ORDER

COME NOW Joe F. Jenkins II, Jill A. Jenkins, and Tri-County Rod and Gun Club, Inc. (“Intervenors”) and hereby move 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, Intervenors state as follows:

1. On July 16, 2021, Atmos Energy Corporation (“Atmos”) filed an Application for Authority to Cease Service (“Application”).
2. On July 29, 2021, Intervenors filed a Petition to Intervene to which no objection has been filed as of this date.
3. In their Petition to Intervene, Intervenors questioned the facts, analyses and policy considerations underlying Atmos’ request to cease providing natural gas service in their area. Intervenors anticipate that the parties will need to conduct discovery in this matter and that some of the responses to discovery may contain confidential, proprietary and/or commercially sensitive material, as defined in K.S.A. 66-1220a, and K.A.R. 82-1-221a.
4. Therefore, Intervenors request that the Commission issue its standard Protective and Discovery Orders to govern this proceeding. Such Orders will facilitate the investigation that needs to be conducted in this matter while protecting the parties from disclosure of sensitive, proprietary, and highly confidential information.

Respectfully submitted,

/s/ Glenda Cafer

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ATTORNEYS FOR PETITIONERS

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

I, Glenda Cafer, verify under penalty of perjury that I have caused the foregoing pleading to be prepared; that I have read and reviewed the same; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

/s/ Glenda Cafer

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing pleading was electronically served this 18th day of August, 2021 to:

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/s/ Glenda Cafer

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