THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of Westar Energy, Inc. and)
Kansas Gas and Electric Company Seeking) Docket No. 16-WSEE-375-TAR
Commission Approval to Implement Changes)
in their Transmission Delivery Charges Rate)
Schedules.)

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 February 15, 2016, Westar Energy, Inc. and Kansas Gas and Electric Company (Westar Energy) filed an application with the Kansas Corporation Commission for Approval to Implement Changes in their Transmission Delivery Charges Rate Schedules.
- 2. On March 15, 2016, CURB filed a Petition to Intervene with the Kansas Corporation Commission in the above mentioned docket.
- 3. Discovery responses may contain confidential information. CURB is requesting the Commission issue a Protective Order and Discovery Order in this docket to allow CURB and its consultant access to the full information contained in this filing.

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

Respectfully submitted,

David W. Nickel, #11170

Consumer Counsel

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, David W. Nickel, 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.

David W. Nickel

SUBSCRIBED AND SWORN to before me this 15th day of March, 2016.

DELLA J. SMITH

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

Notary Public

My Commission expires: 01-26-2017.

CERTIFICATE OF SERVICE

16-WSEE-375-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 15th day of March, 2016, to the following:

ROBERT VINCENT, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 r.vincent@kcc.ks.gov

BRENDA HARRIS, DIRECTOR POWER OCCIDENTAL ENERGY CORPORATION 5 GREENWAY PLAZA, SUITE 110 HOUSTON, TX 77046-0521 Brenda Harris@oxy.com

JAMES P. ZAKOURA, ATTORNEY SMITHYMAN & ZAKOURA, CHTD. 7400 W 110TH ST STE 750 OVERLAND PARK, KS 66210-2362 jim@smizak-law.com

ROBIN ALLACHER, REGULATORY ANALYST WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
Robin.Allacher@westarenergy.com

CATHRYN J. DINGES, SENIOR CORPORATE COUNSEL WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
cathy.dinges@westarenergy.com

JEFFREY L. MARTIN, VICE PRESIDENT, REGULATORY AFFAIRS WESTAR ENERGY, INC.
818 S KANSAS AVE
PO BOX 889
TOPEKA, KS 66601-0889
JEFF.MARTIN@WESTARENERGY.COM

Della Smith

Administrative Specialist