

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

In the Matter of the Application of)
Southern Pioneer Electric Company for) Docket No. 15-SPEE-161-RTS
Approval to Make Certain Changes in its)
Charges for Electric Service.)

MOTION FOR PROTECTIVE ORDER

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

1. Simultaneous with the filing of this motion, Southern Pioneer is filing an Application seeking recovery of revenue for services provided to Southern Pioneer's retail consumers and third-party (local access) customers utilizing Southern Pioneer's 34.5 kV sub-transmission system. Some of the information contained in the filing and anticipated to be sought through discovery 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 parties other than Staff may file to intervene in this matter. Therefore Southern Pioneer requests that the Commission issue its standard Protective Order to govern this proceeding, in order to protect Southern Pioneer and parties who might be granted leave to intervene 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

Application. For these reasons, Southern Pioneer requests that the Commission issue its standard Protective Order in this proceeding.

4. The Commission has substantial latitude in deciding when a Protective Order is appropriate and the degree of protection that is required. A Protective 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 Order and that the said Protective Order apply to all parties in this proceeding.

Respectfully submitted,

Lindsay A. Shepard (#23276)
Executive Vice President – General Counsel
Southern Pioneer Electric Company
P.O. 430
Ulysses, Kansas 67880
(620) 424-5206 telephone
(620) 356-4306 facsimile
lshepard@pioneerelectric.coop

/s/ Terri Pemberton

Glenda Cafer (#13342)
(785) 271-9991
Terri Pemberton (#23297)
(785) 232-2123
CAFER PEMBERTON LLC
3321 SW 6th Avenue
Topeka, Kansas
Facsimile (785) 233-3040
glenda@caferlaw.com
terri@caferlaw.com

**ATTORNEYS FOR SOUTHERN
PIONEER ELECTRIC COMPANY**