

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

Before Commissioners: Andrew J. French, Chairperson
 Dwight D. Keen
 Annie Kuether

In the Matter of an Annual Compliance Docket)
for Electric Supply Line Filings.) Docket No. 24-GIME-002-CPL

**ORDER GRANTING JOINT RESPONDENTS' REQUEST TO
FILE OUT OF TIME; AND PROTECTIVE AND DISCOVERY ORDER**

This matter comes before the State Corporation Commission of the State of Kansas (the “Commission”) for consideration and decision. Having reviewed the pleadings and record, the Commission makes the following findings:

1. On July 6, 2023, the Commission opened this Docket to serve as the annual compliance docket and repository for filing and approval of Electric Supply Line (“EL”) applications during Fiscal Year 2024.

2. On May 8, 2024, NextEra Energy Transmission Southwest, LLC (“NEET Southwest”) submitted a *Motion for Waiver or In the Alternative for Protective Order* representing that it intends to file an EL application notifying the Commission of NEET Southwest’s intent to begin construction of the Wolf Creek to Blackberry Transmission Line (the “Project”).

3. The Commission has addressed the Project twice before: (1) in Docket Number 22-NETE-419-COC (the “CCN Docket”), granting NEET Southwest “a limited certificate of convenience and necessity as a transmission-only public utility in Kansas to construct, own, operate and maintain” the Project; and (2) in Docket Number 23-NETE-585-STG (the “Siting Docket”), granting NEET Southwest a siting permit, subject to certain conditions and modifications.¹

¹ Order on Siting Application at pp. 3, 23, the Siting Docket (May 24, 2023).

4. Here, in addition to representing its intentions regarding the Project, NEET Southwest requests that the Commission grant one of two forms of relief regarding its forthcoming EL Application.²

5. NEET Southwest requests the Commission waive the applicability of the Commission’s Wire-Stringing Rules, K.A.R. 82-12-1 *et seq.*—specifically, K.A.R. 82-12-3(b)—to NEET Southwest’s EL Application.³ NEET Southwest argues the requested waiver is appropriate for three reasons: (1) the Federal Energy Regulatory Commission (“FERC”) has exclusive jurisdiction over transmission rates, in which the costs of the Project will be reflected; (2) the Commission has already performed an extensive review of the costs and financing associated with the Project and issued an order requiring quarterly cost reporting; and (3) the requirements do not independently pertain to the statutory basis for requiring the EL Application.⁴

6. Alternatively, should the Commission deny its waiver request, NEET Southwest requests the Commission issue an enhanced protective order that includes extra protections not offered by the Commission’s standard protective order. Under the requested protective order, information related to the competitive bidding process of the Southwest Power Pool, Inc. (“SPP”) would be classified as “Highly Confidential-Competitive” and restrict recipients of the information to the Commission and Commission technical staff (“Staff”).⁵ NEET Southwest states the information is similar to the information protected in the CCN Docket and the Siting Docket “because it would reveal sensitive cost information used to form NEET Southwest’s bid, and which would likely be the basis of NEET Southwest’s future SPP bids.”⁶

² Motion for Waiver or in the Alternative for Protective Order at 1 (May 8, 2024) (“NEET Southwest’s Motion”).

³ Motion of NEET Southwest at ¶ 5.

⁴ *Id.*

⁵ *Id.* at ¶¶ 13, 14, 19.

⁶ *Id.* at ¶ 15.

7. On June 7, 2024, 4 Rivers Electric Cooperative, Inc. (“4 Rivers”) and Heartland Rural Electric Cooperative, Inc. (“Heartland”) (together, “Joint Respondents”) filed a response in opposition to NEET Southwest’s Motion, arguing that the requested waiver is an inappropriate deviation from the Commission’s Wire-Stringing Rules.⁷ Joint Respondents also argue that the protective order as requested is inappropriate because the Commission’s standard protective order and nondisclosure certificate process adequately protect the information at issue.⁸

8. In addition, Joint Respondents request the Commission to exercise its discretion under K.A.R. 82-1-217(b) and allow Joint Respondents to file their response to NEET Southwest’s Motion out of time.⁹ In support of this request, Joint Respondents state “[w]hile NEET Southwest’s Motion was initially reflected on the Commission’s website..., the Motion no longer appears.” Joint Respondents further state that since the filing of NEET Southwest’s Motion, “there has been no reported activity in this [D]ocket” and “Joint Respondents’ request does not interfere with an existing procedural schedule and future filing dates.”

I. Joint Respondents’ request to file out of time.

9. Under K.A.R. 82-1-218(d), all responsive pleadings must be filed and served within 10 days after service upon that party of any, among others, application, petition, or notice. However, under K.A.R. 82-1-217(b), the time for acting as required or allowed may be extended for good cause by the Commission in its discretion.

10. The Commission finds Joint Respondents have demonstrated good cause for why time should be extended to file their response. The Commission grants Joint Respondents’ request and accept out of time their response to NEET Southwest’s Motion.

⁷ Response of Joint Respondents at ¶ 7 (June 7, 2024).

⁸ *Id.* at ¶ 8.

⁹ *Id.* at ¶ 10.

II. NEET Southwest’s request for waiver.

11. As correctly indicated by Joint Respondents, “review of the cost information in the context of an EL application is very different than a review of costs for rate recovery under the SPP Tariff, the Commission’s certificate and transmission line siting processes, or the type of project cost information provided in SPP’s competitive bidding process.”¹⁰

12. The Commission prescribed the Wire-Stringing Rules to ensure the avoidance of unreasonable injury or interference with the wires of utilities. Here, the application of the requirements under K.A.R. 82-12-3(b) will serve as a metric for NEET Southwest’s compliance with the terms and conditions of the CCN Docket and the Siting Docket. Accordingly, NEET Southwest’s request for waiver of the applicability of K.A.R. 82-12-3(b) to NEET Southwest’s forthcoming EL Application should be denied.

III. NEET Southwest’s request for enhanced protective order.

13. The Commission agrees with NEET Southwest that some information related to a competitive bidding process may be entitled to enhanced protection not offered by the Commission’s standard protective order. Maintaining confidentiality of such information helps ensure the integrity of the SPP competitive process and solicitations related to future projects.

14. The Commission notes it employed a similar two-tier protective order in Docket Numbers 21-KGSG-332-GIG (applying a definition for “Highly Confidential information”); and the CCN Docket and the Siting Docket (applying a definition for “Confidential-Competitive information”).¹¹

¹⁰ Response of Joint Respondents at ¶ 7.

¹¹ Presiding Officer’s Amended Protective Order, Docket No. 21-KGSG-332-GIG at ¶ 11 (Oct. 27, 2021); Order Granting Energy Intervention and Protective and Discovery Order at ¶¶ 17-37, the CCN Docket (Apr. 21, 2022); Protective and Discovery Order, the Siting Docket (Feb. 21, 2023).

15. Here, NEET Southwest cites to the enhanced protective orders issued in the CCN Docket and the Siting Docket—the predecessors of this Docket. However, NEET Southwest does not demonstrate why information that may be classified as “Highly Confidential-Competitive” should now receive even further enhanced protections. The Commission agrees with Joint Respondents that the disclosure and review of “Highly Confidential-Competitive” information should not be limited exclusively to the Commission and Staff. Therefore, disclosure of confidential information is governed by a two-tier protective order described as follows:

A. Protective Order

16. For purposes of this Order, each of the following terms is defined as follows:

(a) “**Competitor**” means parties who participate, or those reasonably expected to participate in the next five years, in a competitive bidding process sponsored by a regional transmission organization.

(b) “**Confidential Information**” means Information which, if disclosed, would likely result in harm to a party’s economic or competitive interests or which would result in harm to the public interest, generally, and which is not otherwise available from public sources. “Confidential Information” includes without limitation: (1) material or documents as defined at K.A.R. 82-1-221a(a)(1) that contain Information relating directly to specific customers; (2) employee-sensitive Information; (3) marketing analyses or other market-specific Information relating to services offered in competition with others; (4) reports, work papers or other Information related to work produced by internal or external auditors or consultants; (5) strategies employed, to be employed, or under consideration; (6) contract negotiations; and (7) Information concerning trade secrets, as well as private technical, financial, and business Information.

(c) **“Highly Confidential-Competitive Information”** means Confidential Information which the designating party reasonably believes, in good faith, to be so competitively sensitive that it is entitled to extraordinary protections—including Confidential Information used to make bids pursuant to a competitive bidding process conducted by a regional transmission organization.

(d) **“Information”** means without limitation any documents as defined at K.A.R. 82-1-221a(a)(1), any other materials furnished pursuant to requests for information or other modes of discovery, or any other materials that are otherwise part of the Commission record.

(e) **“Voluminous Information”** means Information, including Information designated as Confidential or Highly Confidential-Competitive, comprised of 200 or more pages.

17. K.S.A. 66-1220a and K.A.R. 82-1-221a set forth requirements and procedures regarding confidential information in Commission proceedings. The Commission finds it appropriate to issue this Order to establish procedures relating to Confidential Information and Highly Confidential-Competitive Information.

18. In addition, K.S.A. 66-1220a limits the Commission’s disclosure of trade secrets or confidential commercial information of entities regulated by the Commission. Under K.S.A. 66-1220a(a)(4), the Commission is to consider alternatives to disclosure that will serve the public interest and protect the regulated entity. This Order provides an interim procedure under K.S.A. 66-1220a(a)(4) to facilitate the prompt and orderly conduct of all Confidential Information and Highly Confidential-Competitive Information this Docket. This Order governs the treatment and

handling of Confidential Information and Highly Confidential-Competitive Information unless otherwise ordered by the Commission.

19. A party may designate any Information as Confidential Information if that party believes, in good faith, to be a trade secret or other Confidential Information. In addition, a party may designate any Confidential Information as Highly Confidential-Competitive Information if that party believes, in good faith, to be so competitively sensitive that it is entitled to special protections. The party requesting that Information be classified as Confidential Information or Highly Confidential-Competitive Information must provide to the Executive Director of the Commission a copy of the Information clearly marked “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL-COMPETITIVE” and accompanied by a cover letter containing a written, specific explanation of the confidential nature of each article of Information sought to be classified. The party claiming confidentiality has the burden of proving the confidential status of the Information. Designating Information as Confidential Information or Highly Confidential-Competitive Information does not necessarily establish that the Information will be kept from disclosure after review by the Commission.

20. This Order applies to all parties to this Docket, unless otherwise specifically stated. The provisions of this Order apply to Commission technical staff (“Staff”), except that Staff is not required to execute nondisclosure certificates, view Voluminous Information on-site, or return or destroy Confidential Information or Highly Confidential-Competitive Information upon request at the conclusion of the Docket. Third-party experts and consultants used by Staff shall have access to Information and Voluminous Information on the same basis as Staff, except that Staff’s third-party experts and consultants are required to read this Order and execute an applicable nondisclosure certificate as contained in **Appendix A** and **Appendix B**. Parties who do not execute

a nondisclosure certificate will not be granted access to the pertinent Information filed in this Docket.

21. A party designating Information as Confidential Information shall make such Information available to parties seeking access or discovery under the restrictions of this Order, if such disclosure is not otherwise privileged or objectionable on other evidentiary grounds.

22. Disclosure of Confidential Information shall be made to attorneys of record and to authorized representatives, including third-party experts, who are consulting with parties or intend to file testimony in this Docket. Attorneys or authorized representatives seeking access to Confidential Information shall first read this Order and execute a nondisclosure certificate as contained in **Appendix A**. In instances where a utility's rates are being reviewed, attorneys and representatives of the utility whose rates are being reviewed are not required to sign a nondisclosure certificate in order to receive copies of Information containing the utility's own Confidential Information. The nondisclosure certificate shall contain the signatory's name, permanent address, title or position, date signed, and an affirmation that the signer is acting on behalf of a party to this Docket. The nondisclosure certificate shall be filed in the Docket. The party claiming confidentiality shall provide legible copies of the Confidential Information to requesting parties by serving one copy upon counsel for the requesting party. The requesting party may copy the Confidential Information and make the copy or copies available to its authorized representatives who have executed and filed a nondisclosure certificate. If a response to a discovery request requires the duplication of Voluminous Information, or the Voluminous Information is not easily copied because of its binding or size, the furnishing party may require that such Voluminous Information be viewed on its own premises. If duplication of Voluminous

Information can be accomplished without undue burden on the party disclosing the Voluminous Information, the Voluminous Information may be copied at the expense of the requesting party.

23. Disclosure of Highly Confidential-Competitive Information shall be made pursuant to the terms of Paragraph 22, but with the following additional protections:

(a) Disclosure of Information designated by a party as Highly Confidential-Competitive may be made available to only the following individuals who have executed the Commission-approved nondisclosure agreement attached as **Appendix B**: (i) outside retained attorneys of record; (ii) outside consultants for Competitors; (iii) representatives of Staff, and other non-Competitor parties to this Docket, except that Staff is not required to sign nondisclosure certificates.

(b) No Highly Confidential-Competitive Information may be provided directly or indirectly to any other person, including in-house counsel, other than as specified in subsection (a)(i) above.

24. A party may designate pre-filed testimony and exhibits as Confidential Information or Highly Confidential-Competitive Information pursuant to this Order. The specific grounds for the designation as Confidential Information shall be stated in writing at the time the designation is made or the testimony filed. Any party obtaining Confidential Information or Highly Confidential-Competitive Information may use or refer to such in pre-filed or oral testimony provided that the confidentiality is maintained, unless otherwise ordered by the Commission.

25. If Information to be disclosed in response to a data request contains Confidential Information or Highly Confidential-Competitive Information designated by another party to this Docket, the furnishing party shall maintain the confidential status by marking the Confidential Information and Highly Confidential-Competitive Information as such and only provide a response

to parties that have executed an applicable nondisclosure certificate. If Information that a party intends to use in this Docket or that would be disclosed in response to a data request contains Confidential Information or Highly Confidential-Competitive Information obtained from a source outside of this Docket, the party intending to use or provide the Confidential Information or Highly Confidential-Competitive Information must notify the original source which claimed confidential status to allow that entity to decide whether to claim confidentiality in this Docket.

26. When pleadings, pre-filed testimony, or exhibits include Confidential Information or Highly Confidential-Competitive Information, the parties are to comply with the following procedures:

(a) File seven copies of the complete Information at issue, including all Confidential Information. In cases where there is both Confidential Information and Highly Confidential-Competitive Information, the cover is to clearly state “HIGHLY CONFIDENTIAL-COMPETITIVE.” Pages containing Highly Confidential-Competitive Information shall be stamped “HIGHLY CONFIDENTIAL-COMPETITIVE,” and the specific Highly Confidential-Competitive Information shall be identified by being underlined, bolded, and highlighted. Any Confidential Information that is not Highly Confidential-Competitive Information shall be identified by being underlined. In cases where there is only Confidential Information, the cover is to clearly state “CONFIDENTIAL.” Pages containing Confidential Information must be stamped “CONFIDENTIAL” and the specific Confidential Information must be identified by being underlined.

(b) File one copy with the Confidential Information and/or Highly Confidential-Competitive Information redacted, for use as public Information. The cover must clearly state “PUBLIC VERSION.”

(c) File one copy of the portions that contain Confidential Information and/or Highly Confidential-Competitive Information in a separate envelope marked “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL-COMPETITIVE.” That filing will be maintained in the Docket Room file under seal. If there are multiple portions containing Confidential Information or Highly Confidential-Competitive Information and it is impracticable to separate the portions with the Confidential Information or Highly Confidential-Competitive Information, the party may file instead one copy of the entire Information that clearly states “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL-COMPETITIVE.”

27. Confidential Information or Highly Confidential-Competitive Information in the form of testimony may be offered and subject to cross-examination at hearings. Parties have the right to object to the admissibility of Confidential Information or Highly Confidential-Competitive Information on standard evidentiary grounds such as relevance. Confidential Information or Highly Confidential-Competitive Information received into evidence will be kept under seal. Confidential Information or Highly Confidential-Competitive Information shall be discussed only after the proceeding is closed to all persons other than the Commission, Staff, hearing examiners, court reporters, attorneys of record, and individuals to whom the Confidential Information or Highly Confidential-Competitive Information is available under the terms of this Order. Parties shall make every effort at hearings to ask and answer questions in such a way as to preserve the confidentiality of Confidential Information or Highly Confidential-Competitive Information

without the need to close the hearing. The transcript of live testimony or oral argument disclosing Confidential Information or Highly Confidential-Competitive Information shall be kept under seal and copies provided only to persons entitled to access to Confidential Information or Highly Confidential-Competitive Information. Neither the parties nor their attorneys may disclose or provide copies of the contents of such transcripts to anyone other than those who have access to the Confidential Information or Highly Confidential-Competitive Information under the terms of this Order.

28. If a party disagrees with a claim that Information is Confidential Information or Highly Confidential-Competitive Information, or such Information should not be disclosed, the parties shall first attempt to resolve the dispute on an informal basis. If the parties cannot informally resolve the dispute, the party contesting the designation as Confidential Information or Highly Confidential-Competitive Information may file a motion with the Commission. Staff should also be prepared to challenge a designation as Confidential Information or Highly Confidential-Competitive Information when Staff believes the Information does not meet the definition of Confidential Information or Highly Confidential-Competitive Information. When a dispute concerning confidentiality is brought before the Commission, the Commission will review the matter to determine: (1) if the party claiming confidentiality has met its burden of establishing the designation as Confidential Information or Highly Confidential-Competitive Information is proper; and (2) whether disclosure of the Confidential Information or Highly Confidential-Competitive Information is warranted under K.S.A. 66-1220a. The contested Confidential Information or Highly Confidential-Competitive Information shall not be disclosed pending the Commission's ruling.

29. All persons who are afforded access to Confidential Information or Highly Confidential-Competitive Information under the terms of this Order shall neither use nor disclose such Confidential Information or Highly Confidential-Competitive Information for purposes of business, competition, or any other purpose other than preparing for and litigating this Docket. During the course of this Docket, parties shall keep Confidential Information or Highly Confidential-Competitive Information secure in accordance with the purposes and intent of this Order. At the conclusion of this Docket, including judicial review, if any, a party claiming that Information was Confidential Information or Highly Confidential-Competitive Information may require that other persons in possession of its Confidential Information or Highly Confidential-Competitive Information return or destroy all of such and all Information containing, summarizing, or otherwise embodying such Confidential Information or Highly Confidential-Competitive Information. If the party claiming confidentiality requests destruction of the Confidential Information or Highly Confidential-Competitive Information, the person destroying such Information shall certify its destruction. Counsel shall be entitled to retain memoranda or pleadings including or embodying Confidential Information or Highly Confidential-Competitive Information to the extent reasonably necessary to preserve a file on this Docket.

B. Discovery Order

30. The Commission finds that formalizing discovery procedures and clarifying the obligations of the parties will help ensure a full and efficient investigation of the issues in this Docket. This Order will govern the conduct of discovery in this Docket unless otherwise ordered by the Commission. Parties may request modified or additional discovery procedures, or may request that the Commission set a discovery pre-hearing conference.

31. **General procedures.** Discovery in Commission proceedings is limited to issues that are “clearly relevant.” After a docket is opened, any party may serve upon any other party written discovery or data requests. Such data requests shall identify with reasonable particularity the Information sought. Data requests must be designed to elicit material facts within the knowledge of the parties. Data requests that require conclusions of law or answers to hypothetical questions generally are not permitted. Cross-examination through the use of data requests is inappropriate. Copies of data requests shall be served upon all other parties to the Docket, unless a party otherwise requests. Data requests and responses shall be served through the Commission’s CoreShare document control system. Any party that objects to using CoreShare may file a motion requesting to be excused from the requirement, provided the party shows good cause for why it cannot comply. Data requests that are sent by a party after 5:00 p.m. shall be deemed to have been received the following business day.

32. **Data Request Responses.** Responses to Staff data requests are due within seven days of receipt of the data request. Responses to all other data requests are due within 10 days of receiving the data request. In computing the period of time for responding, the day on which the data request was issued is not counted. Furthermore, for purposes of calculating all discovery-related deadlines, intermediate Saturdays, Sundays, and legal holidays shall be excluded. Parties may agree to extensions or reductions of time in which to respond or object to a data request. Responses to data requests shall be verified and identify the person or persons who actually prepared the response and can answer additional questions relating to the response. Each data request shall be answered separately and preceded by the data request to which the response pertains. Responses shall be clearly identified and, if consisting of several pages, shall be labeled and organized in a manner that makes review of the pages convenient. Parties are under a

continuing duty to supplement their discovery responses upon learning that information previously disclosed is incomplete or incorrect in any material respect. If a response to a data request requires the duplication of Voluminous Information or of Information that is not easily copied because of its binding or size, a party may require that any party other than Staff review the Voluminous Information on its own premises. If duplication of Voluminous Information can be accomplished without undue burden, the Voluminous Information may be copied at the expense of the requesting party.

33. **Objections to Data Requests.** If the parties have agreed to electronic service, and a party objects to answering a particular data request, the party shall object in writing to the party that issued the data request within five days of receiving the data request. If the parties have not agreed to electronic service, and a party objects to answering a particular data request, the objecting party shall object in writing to the issuing party within five days after receiving the data request, plus three days if service is by mail. The written objection shall specifically explain all grounds relied upon for objecting to each data request. Any objections not provided at that time will be considered waived. If an objection pertains only to part of a data request, that part shall be clearly identified and the responding party shall provide any non-objectionable Information covered by the remainder of the data request. Parties shall negotiate in good faith to resolve discovery disputes. If resolution is not possible, the party seeking discovery may file with the Commission a motion to compel. Motions to compel must have the data request and response at issue attached. Motions to compel are required to be served by hand delivery, electronic mail, facsimile, or next-day delivery service. Responses to motions to compel are to be filed within three days after receiving the motion. The Commission may act immediately on motions to compel if necessitated by time constraints or the procedural schedule in the Docket.

34. **Limitations on Discovery.** The Commission may limit discovery to protect a party against unreasonable, cumulative, or duplicative discovery requests; to prevent undue delay in the proceeding; to avoid unnecessary burden, expense, or harassment; or to otherwise maintain the orderly and efficient progress of the Docket. Upon finding that a party has abused the discovery process, the Commission may deny the right to continue discovery.

35. **Sanctions.** A motion for sanctions for discovery violations may be filed at any time during the Docket or may be initiated by the Commission. A motion for sanctions must contain sufficient factual allegations to detail the alleged violation and specify the relief requested. Motions for sanctions are required to be served by hand delivery, electronic mail, facsimile, or next-day delivery service. Responses to motions for sanctions must be filed within 10 days after receiving the motion.

(a) The Commission will consider any relevant factors when reviewing a motion for sanctions, including whether discovery has been conducted in bad faith or for an improper purpose such as causing unnecessary delay or needless increase in the cost of the Docket; whether the discovery process has been abused in seeking or resisting discovery; and whether parties have failed to obey Commission Orders.

(b) Sanctions imposed by the Commission may include limiting or disallowing further discovery; holding that designated facts be deemed admitted for purposes of the Docket; refusing to allow a party to support or oppose a claim or defense or prohibiting the party from introducing designated matters in evidence; disallowing in whole or in part requests for relief by the offending party and excluding evidence in support of such requests; striking pleadings or testimony; staying further proceedings until an order is obeyed; disallowing a party's right to participate in the Docket; dismissing the application

or filing with or without prejudice; requiring the offending party to pay the reasonable expenses, including attorney's fees, incurred by other parties because of the sanctionable behavior; and imposing any other sanction or remedy available to the Commission by law.

THEREFORE, THE COMMISSION ORDERS:

- A. Joint Respondents' request to file their response to NEET Southwest's Motion out of time is granted and their Response is accepted for filing.
- B. NEET Southwest's request for waiver of the requirements under K.A.R. 82-12-3(b) is denied.
- C. NEET Southwest's request for an enhanced protective order is granted as modified.
- D. The provisions of this Order apply throughout this Docket.
- E. The parties have 15 days from the date this Order was electronically served to petition for reconsideration.¹²

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 07/09/2024



Lynn M. Retz
Executive Director

KCW

¹² K.S.A. 66-118b; K.S.A. 77-529(a)(1).

**APPENDIX A
CONFIDENTIAL**

Docket No. 24-GIME-002-CPL
THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

NONDISCLOSURE CERTIFICATE

I, _____, have been presented a copy of the Order issued in Docket No. 24-GIME-002-CPL on the 9th day of July, 2024.

I have requested access to **Confidential Information** produced in the above-captioned Docket on behalf of _____.

I certify that I have read the above Order and agree to abide by its provisions.

Dated this ____ day of _____, 2024.

Printed name and title

Signature

Party/Employer

Address (City, State, and Zip code)

Telephone

Email

**APPENDIX B
HIGHLY CONFIDENTIAL-COMPETITIVE**

Docket No. 24-GIME-002-CPL
THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

NONDISCLOSURE CERTIFICATE

I, _____, have been presented a copy of the Order issued in Docket No. 24-GIME-002-CPL on the 9th day of July, 2024.

I have requested access to **Highly Confidential-Competitive Information** produced in the above-captioned Docket on behalf of _____.

I am an employee of _____ acting as ___ [state role from list of eligible persons from Paragraph 23] ___ for _____.

I certify that I have read the above Order and agree to abide by its provisions.

Dated this _____ day of _____, 2024.

Printed name and title

Signature

Party/Employer

Address (City, State, and Zip code)

Telephone

Email

CERTIFICATE OF SERVICE

24-GIME-002-CPL

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of electronic service on 07/09/2024. A copy mailed by US mail to those without electronic email.

REGINA KEWLEY

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CERTIFICATE OF SERVICE

24-GIME-002-CPL

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