

**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 NEET SOUTHWEST’S MOTION FOR RECONSIDERATION;  
REVISED PROTECTIVE ORDER**

This Docket comes before the State Corporation Commission of the State of Kansas (the “Commission”) for consideration and decision on the *Motion for Reconsideration* filed by NextEra Energy Transmission Southwest, LLC (“NEET Southwest”). Having reviewed the record and its files, the Commission makes the following findings:

1.        On July 6, 2023, the Commission opened this Docket 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”) filed a *Motion for Waiver or In the Alternative for Protective Order* requesting a waiver 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. Alternatively, NEET Southwest requested the Commission an enhanced protective order where information related to the competitive bidding process of the Southwest Power Pool, Inc. (“SPP”) would be classified as “Highly Confidential-Competitive” and be restricted to the Commission and Commission technical staff (“Staff”).<sup>1</sup>

3.        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

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<sup>1</sup> *Id.* at ¶¶ 13-14, 19.

opposition to NEET Southwest’s motion, arguing, in part, that the Commission’s standard protective order and nondisclosure certificate process adequately protect the information at issue.<sup>2</sup>

4. After considering the respective arguments of NEET Southwest and Joint Respondents, the Commission agreed with NEET Southwest that some information related to a competitive bidding process may be entitled to enhanced protection and that maintaining confidentiality of such information helps ensure the integrity of the SPP competitive process and solicitations related to future projects.<sup>3</sup> However, the Commission also agreed with Joint Respondents that the disclosure and review of “Highly Confidential-Competitive” information should not be limited exclusively to the Commission and Staff.<sup>4</sup> Accordingly, the Commission issued an Order (the “Protective & Discovery Order”) on July 9, 2024, mandating the disclosure of confidential information be governed by a two-tier protective order.<sup>5</sup> In the Protective & Discovery Order, the Commission also included provisions formalizing discovery procedures and clarifying the obligations of the parties to help ensure a full and efficient investigation of the issues in this Docket.<sup>6</sup>

5. On August 8, 2024, NEET Southwest filed its Motion for Reconsideration, requesting the Commission strike the portion of the Protective & Discovery Order that authorizes discovery. NEET Southwest explains because this Docket is merely a repository for Staff to track its ministerial review and approval of EL applications, discovery is inappropriate.

6. The Commission agrees with NEET Southwest and finds that NEET Southwest’s *Motion for Reconsideration* should be granted. The Commission revokes its Protective and

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<sup>2</sup> Response of Joint Respondents at ¶ 8 (June 7, 2024).

<sup>3</sup> Protective & Discovery Order at ¶ 13 (July 9, 2024).

<sup>4</sup> *Id.* at ¶ 15.

<sup>5</sup> Protective & Discovery Order at ¶ 15.

<sup>6</sup> *Id.* at ¶ 30.

Discovery Order issued July 9, 2024, and replaces it with an enhanced Protective Order, attached as Attachment A.

7. In the future, filings related to costs associated with a newly approved transmission line can be made in the compliance docket for that specific project, and simply referenced in the general EL Docket.

**THEREFORE, THE COMMISSION ORDERS:**

A. NEET Southwest's *Motion for Reconsideration* is granted.

B. The provisions of Protective Order, attached as Attachment A, shall govern the treatment and handling of confidential information in this Docket.

**BY THE COMMISSION IT IS SO ORDERED.**

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 08/22/2024



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Lynn M. Retz  
Executive Director

KCW

**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

**PROTECTIVE 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* requesting 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.<sup>1</sup> 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.<sup>2</sup>

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<sup>1</sup> Motion of NEET Southwest at ¶ 5.

<sup>2</sup> *Id.*

3. Alternatively, NEET Southwest requests the Commission issue an enhanced protective order where 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”).<sup>3</sup> 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.”<sup>4</sup>

4. 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.<sup>5</sup> Joint Respondents also argue that the Commission’s standard protective order and nondisclosure certificate process adequately protect the information at issue.<sup>6</sup>

5. 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.

6. 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

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<sup>3</sup> *Id.* at ¶¶ 13, 14, 19.

<sup>4</sup> *Id.* at ¶ 15.

<sup>5</sup> Response of Joint Respondents at ¶ 7 (June 7, 2024).

<sup>6</sup> *Id.* at ¶ 8.

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:

**Protective Order**

7. 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.

8. 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.

9. 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.

10. 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.

11. 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.



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

13. Attorneys or authorized representatives seeking access to Confidential Information shall first read this Order and execute a nondisclosure certificate as contained in **Appendix A**. 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.

14. Disclosure of Highly Confidential-Competitive Information shall be made pursuant to the terms of Paragraph 13, 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.

15. A party may designate 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.

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

(a) A party utilizes electronic filing shall file one copy 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."

17. 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.

18. 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, 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.

**THEREFORE, THE COMMISSION ORDERS:**

A. The provisions of this Order govern the treatment and handling of Confidential Information and Highly Confidential-Competitive Information in this Docket.

B. This Order is procedural and constitutes non-final agency action.<sup>7</sup>

**BY THE COMMISSION IT IS SO ORDERED.**

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: \_\_\_\_\_

\_\_\_\_\_  
Lynn M. Retz  
Executive Director

KCW

<sup>7</sup> K.S.A. 77-607(b)(2).

**APPENDIX A**

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 15th day of August, 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**

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 15th day of August, 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 14]     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

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Address (City, State, and Zip code)

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\_\_\_\_\_  
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 08/22/2024.

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24-GIME-002-CPL

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24-GIME-002-CPL

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24-GIME-002-CPL

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24-GIME-002-CPL

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