

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

In the Matter of the Application of Mid-            )  
Kansas Electric Company, LLC for                )  
Approval to Make Certain Changes in its        ) Docket No.: 12-MKEE-380-RTS  
Charges for Electric Service in the            )  
Geographic Service Territory Served by        )  
Southern Pioneer Electric Company.            )

**MOTION FOR PROTECTIVE ORDER**

Mid-Kansas Electric Company, LLC (Mid-Kansas), 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, Mid-Kansas states:

1. On December 20, 2011, Mid-Kansas filed a rate case Application and supporting schedules for the geographic service territory served by its member owner Southern Pioneer Electric Company (Southern Pioneer). In anticipation of the rate case filing Commission Staff (Staff) issued to Mid-Kansas and Southern Pioneer a series of standard data requests used to assist Staff in conducting investigations into matters of this nature. Some of the information sought by Staff is confidential, proprietary and/or commercially sensitive material, as defined in K.S.A. 66-1220a, and K.A.R. 82-1-221a..

2. Mid-Kansas anticipates that parties other than Staff may file to intervene in this matter. Therefore Mid-Kansas requests that the Commission issue its standard protective order to govern this proceeding, in order to protect Mid-Kansas 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.

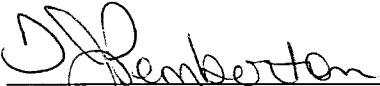
3. Mid-Kansas submits that the interest in maintaining the confidential status of qualifying material and avoiding the harm that otherwise would result to the parties outweighs any interest in disclosing the material to unauthorized parties or in proceedings unrelated to the Application. For these reasons, Mid-Kansas 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, Mid-Kansas 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,

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**COUNSEL FOR MID-KANSAS ELECTRIC  
COMPANY, LLC**

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and correct copy of the above *Motion for Protective Order* was electronically served, hand-delivered or mailed, postage prepaid, this 3<sup>rd</sup> day of January, 2012 to:

MATTHEW SPURGIN  
KANSAS CORPORATION COMMISSION  
1500 SWARROWHEAD ROAD  
TOPEKA, KS 66604-4027

  
TERRI PEMBERTON