# THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

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In the Matter of the Application of Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy, for Approval of the Commission for Gas System Reliability Surcharge per K.S.A. 66-2201 through 66-2204.

Docket No. 14-BHCG-593-TAR

## CURB'S MOTION FOR PROTECTIVE ORDER

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB"), hereby moves the Corporation Commission of the State of the Kansas ("Commission") to issue a Protective Order in this docket.

1. On June 24, 2014, Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills

Energy filed an application with the Kansas Corporation Commission seeking approval for Gas System Reliability Surcharge per K.S.A. 66-201 through 66-2204.

2. On July 22, 2014, the Commission granted CURB's intervention that was filed in the above mentioned docket on June 26, 2014.

3. In the filing, portions of the application was filed as confidential information. CURB is requesting the Commission issue a Protective 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 in this docket.

### **VERIFICATION**

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STATE OF KANSAS

COUNTY OF SHAWNEE

I, Niki Christopher, 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.

Niki Christopher

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SUBSCRIBED AND SWORN to before me this 29<sup>th</sup> day of July, 2014.

Notary Public

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

My Commission expires: 01-26-2017.

Respectfully submitted,

David Springe #15619 Niki Christopher #19311 Citizens' Utility Ratepayer Board 1500 SW Arrowhead Road Topeka, KS 66604 (785) 271-3200 (785) 271-3116 Fax

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### **CERTIFICATE OF SERVICE**

#### 14-BHCG-593-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 29<sup>th</sup> day of July, 2014, to the following:

JAMES G. FLAHERTY, ATTORNEY ANDERSON & BYRD, L.L.P. 216 S HICKORY PO BOX 17 OTTAWA, KS 66067 jflaherty@andersonbyrd.com

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Della Smith Administrative Specialist