THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of Westar)
Energy, Inc. and Kansas Gas and Electric) Docket No. 15-WSEE-182-MIS
Company for Approval of a Revision to)
Their Project Deserve Program.)

CURB'S MOTION FOR PROTECTIVE ORDER & DISCOVERY ORDER

COMES NOW, the Citizens' Utility Ratepayer Board ("CURB"), hereby moves the Corporation Commission of the State of the Kansas ("Commission") for an issuance of a Protective Order and Discovery Order in the above-captioned proceeding.

- 1. On October 27, 2014, Westar Energy, Inc. and Kansas Gas and Electric Company (Westar Energy) filed an application with the Kansas Corporation Commission for approval of a revision to their Project Deserve Program.
- 2. On October 29, 2014 CURB filed a Petition to Intervene with the Kansas Corporation Commission in the above mentioned docket.
- 3. Discovery responses may contain confidential information. CURB is requesting the Commission issue a Protective Order and Discovery 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 and Discovery Order in this docket.

Respectfully submitted,

David Springe #15619

Niki Christopher #19311

Citizens' Utility Ratepayer Board

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VERIFICATION

STATE OF KANSAS)	
)	ss:
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

SUBSCRIBED AND SWORN to before me this 14th day of November, 2014.

Notary Public

My Commission expires: 01-26-2017.

A DELLA J. SMITH

Notary Public - State of Kansas
My Appl. Expires January 26, 2017

CERTIFICATE OF SERVICE

15-WSEE-182-MIS

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing document was served by electronic service on this 14th day of November, 2014, to the following:

ROBERT VINCENT, LITIGATION ATTORNEY KANSAS CORPORATION COMMISSION 1500 SW ARROWHEAD RD TOPEKA, KS 66604-4027 r.vincent@kcc,ks.gov

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