

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.

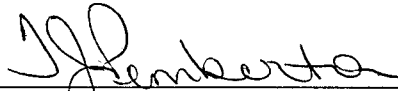
4. The Commission has substantial latitude in deciding when a protective order is appropriate and the degree of protection that is required. A Protective Order will enable the Commission to manage the discovery process in a manner that furthers the goal of full disclosure of relevant, non-sensitive information, 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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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above *Motion for Protective Order* was served electronically by e-mail, hand-delivered or mailed, postage prepaid, this 6th day of August, 2012 to:

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