

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

In the Matter of the Application of Southern)
Pioneer Electric Company for Approval to) Docket No. 24-SPEE- 415 -TAR
Make Certain Revenue Neutral Changes to its)
Rate Design.)

MOTION FOR DISCOVERY AND PROTECTIVE ORDER

COMES NOW Southern Pioneer Electric Company (“Southern Pioneer”), and hereby moves the State Corporation Commission of the State of Kansas (“Commission”) to issue a Discovery Order and Protective Order in this docket. In support of its motion, Southern Pioneer states as follows:

1. Simultaneous with the filing of this Motion, Southern Pioneer is filing an Application seeking approval to make certain revenue neutral changes in its rate design. Southern Pioneer anticipates there will be parties other than Staff seeking to intervene in this proceeding and that they will need to conduct discovery on the Application. Some of the information shared with the parties may be confidential, proprietary and/or commercially sensitive material, as defined in K.S.A. 66-1220a, and K.A.R. 82-1-221a.

2. Therefore, Southern Pioneer requests that the Commission issue its standard Discovery and Protective Orders to govern this proceeding to facilitate the review and investigation of this matter and to protect Southern Pioneer from public disclosure of sensitive, proprietary, and highly confidential information.

WHEREFORE, Southern Pioneer respectfully requests that the Commission issue its standard Discovery and Protective Orders as set forth above.

Respectfully submitted,

/s/ Glenda Cafer

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**ATTORNEYS FOR SOUTHERN PIONEER
ELECTRIC COMPANY**

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

VERIFICATION

I, Glenda Cafer, verify under penalty of perjury that I have caused the foregoing pleading to be prepared; that I have read and reviewed the same; and that the contents thereof are true and correct to the best of my information, knowledge, and belief.

/s/ Glenda Cafer