

BEFORE THE CORPORATION COMMISSION OF STATE OF OKLAHOMA

IN THE MATTER OF THE APPLICATION OF )  
SUMMIT UTILITIES OKLAHOMA, INC., FOR )  
APPROVAL OF ITS )  
PERFORMANCE-BASED RATE CHANGE )  
PLAN CALCULATIONS FOR THE TWELVE )  
MONTHS ENDING DECEMBER 31, 2021 )

CAUSE NO. PUD 202200022

**FILED**  
MAR 15 2022

COURT CLERK'S OFFICE - OKC  
CORPORATION COMMISSION  
OF OKLAHOMA

**MOTION FOR PROTECTIVE ORDER**

Summit Utilities Oklahoma, Inc. (“SUO” or the “Company”), hereby moves for a Protective Order regarding confidential and proprietary information. In support of this motion, SUO would show the following:

1. In the course of these proceedings, SUO may provide or may be asked to produce certain information which is considered confidential and proprietary. Without waiving any objection to future requests, SUO believes that a Protective Order should be issued now to cover all possible areas of inquiry to avoid later delay in the discovery process.

2. In order to protect such information from unauthorized disclosure, the Protective Order should cover the following:

(a) *Information or documents reflecting or relating to the planning and strategic business, marketing or operational plans, studies or presentations for any time period after the end of the test year; market evaluations and program plans; plans for issuance of securities or other sources of funding and similar documents.*

(b) *Information or documents reflecting or relating to operating budgets, actual budgets, original budgets, revised budgets, supply or sales forecasts, demand forecasts, and similar information for any time period after the end of the test year.*

(c) *Income tax returns and supporting schedules and workpapers.*

(d) *All current financial and financing information which would reveal competitively sensitive information (including but not limited to balance sheets, financial statements, operating statements, lending facilities and credit lines) prior to its public disclosure through regular filings with state or federal securities commissions and agencies.*

(e) *Information or documents containing the names of individual customers, or from which individual customers could reasonably be identified, and which contain the terms of individual customer contracts, individual gas usages or individual prices or other individual material terms associated with SUO's business with those customers.*

(f) *Information or documents that reflect or discuss the assessment of a customer's ability to bypass SUO's facilities and which identify the customer or contain information from which the customer reasonably could be identified; and/or information or documents that reflect or discuss SUO's analysis or methodology for determining appropriate competitive rates for customers with bypass alternatives.*

(g) *Information or documents of a personal nature, or containing compensation or benefit information, about any specific SUO employee, unless otherwise publicly disclosed. SUO reserves the right to seek further protection with regard to information concerning any employee or any SUO officer should circumstances later occasion the need for such protection.*

(h) *Reports and documents of internal or external auditors which contain (or to the extent they contain) information concerning the internal controls of the Company, which contain any information described above, or which otherwise would reflect SUO's operations in a manner which would reveal competitively sensitive information.*

(i) *All computer software, files or other similar information provided by SUO, to the extent that it either contains information or data described above or represents a proprietary product for which disclosure by SUO to a third party may be constrained.*

(j) *Confidential settlement information and agreements to which SUO is a party.*

(k) *Information or documents reflecting or relating to the planning and strategic business, marketing or operational plans, studies or presentations for any time period after the end of the test year; market evaluations and program plans; plans for issuance of securities or other sources of funding and similar documents.*

(l) *Information or documents reflecting or relating to operating budgets, actual budgets, original budgets, revised budgets, supply or sales forecasts, demand forecasts, and similar information for any time period after the end of the test year.*

(m) *All notes, testimony or other information or documents derived from and containing information designated as confidential or highly confidential under Paragraphs (a) through (l) of this Protective Order.*

WHEREFORE, SUO requests the Commission enter a Protective Order to be used by the Parties to the proceeding, as needed to protect proprietary, confidential and highly sensitive information and documents in this cause.

Respectfully submitted,

*/s/ J. Dillon Curran*

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ATTORNEYS FOR SUMMIT UTILITIES  
OKLAHOMA, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15th day of March, 2022, a full, true, and correct copy of the above and foregoing instrument was served on the following persons by **ELECTRONIC MAIL** and by **UNITED STATES CERTIFIED MAIL**, postage prepaid to:

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*/s/ J. Dillon Curran* \_\_\_\_\_