BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA

APPLICATION OF OKLAHOMA NATURAL) GAS COMPANY, A DIVISION OF ONE GAS,) INC., FOR APPROVAL OF ITS) PERFORMANCE BASED RATE CHANGE) PLAN CALCULATIONS FOR THE TWELVE MONTHS ENDING DECEMBER 31. 2021. ENERGY EFFICIENCY TRUE-UP AND UTILITY INCENTIVE ADJUSTMENTS FOR PROGRAM YEAR 2021, AND CHANGES OR) MODIFICATIONS TO ITS TARIFFS)

CAUSE NO. PUD 2022<u>00023</u>



MOTION FOR PROTECTIVE ORDER

Oklahoma Natural Gas Company, a division of ONE Gas, Inc. ("Oklahoma Natural" or the "Company") for its Motion for Protective Order states as follows:

1. In the course of these proceedings, Oklahoma Natural may wish to provide or

may be asked to produce certain information which is considered confidential and proprietary.

Without waiving any objection to future requests, Oklahoma Natural believes that a Protective

Order should be issued now to cover such potential information to facilitate review of this Cause

by the Commission's Public Utility Division and 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:

Critical infrastructure (Homeland Security) information, specific employee/retiree compensation records and studies, employment tax returns, executive compensation studies, corporate tax returns, Board minutes, internal/external audit reports, internal management memoranda, non-public Sarbanes-Oxley compliance information, confidential contracts and agreements, commercially sensitive and proprietary information, and the underlying supportive documentation for these items.

A protective order covering the above materials is consistent with protective orders issued by the Commission in other Causes involving Oklahoma Natural and its books and records. Oklahoma Natural reserves the right to seek an amendment to the protective order

to cover additional information and materials should such be necessary.

WHEREFORE, Oklahoma Natural requests that the Commission issue a protective order

covering the materials described above.

Respectfully submitted,

/s/ Dustin R. Frederick Dustin R. Fredrick, OBA #19095 Managing Attorney 401 North Harvey Avenue Oklahoma City, Oklahoma 73102 Telephone: (405)551-6631 Facsimile: (405)551-6801 dustin.fredrick@onegas.com

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Attorneys for Oklahoma Natural Gas Company, a division of ONE Gas, 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 **HAND DELIVERY**, by **ELECTRONIC MAIL** or by **UNITED STATES MAIL** to:

Brandy L. Wreath Director of the Public Utility Division OKLAHOMA CORPORATION COMMISSION Jim Thorpe Building 2101 North Lincoln Boulevard Oklahoma City, Oklahoma 73105 PUDenergy@occemail.com

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/s/ Dustin R. Frederick _____

Dustin R. Fredrick