

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Co-Mo )  
Electric Cooperative for Approval of ) Case No. EO-2022-0190  
Designated Service Boundaries Within )  
Portions of Cooper County, Missouri )

**MOTION FOR PROTECTIVE ORDER**

**COMES NOW** Co-Mo Electric Cooperative (Co-Mo), and for its Motion for Protective Order hereby requests the Commission, pursuant to 20 CSR 4240-2.135, to issue a protective order in this matter with respect to highly confidential financial and business information provided in conjunction with Co-Mo's Application which requires compliance with 20 CSR 4240-20.045. In support of its motion, Applicant states as follows:

1. Co-Mo is a rural electric cooperative engaged in the distribution of electric energy service to its members. The public disclosure of certain financial and business information of Co-Mo could be injurious to its business and competitive positions.
2. Co-Mo has previously filed its Application which requires compliance with 20 CSR 4240-20.045. That regulation requires Co-Mo to supplement its Application with a feasibility study containing plans and specifications for the utility system, plans for financing, proposed rates and charges, and an estimate of the number of customers, revenues, and expenses during the first three (3) years of operations.
3. Co-Mo will file **Appendix H** to the Application, its feasibility study containing highly confidential financial and business information, after the Commission issues its Protective Order in this matter.
4. Applicant's feasibility study contains private and confidential financial and

business information, and therefore constitutes highly confidential information entitled to protection from disclosure under 20 CSR 4240-2.135.

5. None of the information for which Applicant claims confidentiality has been released in any format in any other public document.

WHEREFORE, Co-Mo respectfully requests that the Commission issue its protective order in this proceeding with respect to Co-Mo's highly confidential financial information to be late-filed as **Appendix H** to Co-Mo's Application.

**Respectfully submitted,**

/s/ Megan E. Ray

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## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on February 16, 2022, to the following:

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