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

The Staff of the Missouri Public Service Commission,	)	
Service Commission,	)	
Complainant,	)	
	)	
v.	)	File No. RC-2012-0421
	)	
Cintex Wireless, LLC,	)	
Respondent.	)	

## MOTION TO FILE DOCUMENT AS VERY HIGHLY CONFIDENTIAL

COMES Now the Staff ("Staff") of the Missouri Public Service Commission and respectfully states:

- 1. The Parties in this matter are engaged in settlement discussions. If those discussions result in a settlement of this case, the Parties will file a sensitive document that the Staff believes will not be adequately protected by designation of the document as HC in the Commission's EFIS system.
- 2. Pursuant to 4 CSR 240-2.135(6), the Staff avers that disclosure of the document could be irreparably damaging to Cintex Wireless, LLC; that access to the document should be limited to the Commissioners, the assigned Regulatory Law Judge, the Public Counsel, and attorneys of record in this matter, provided that such persons with access may share the document with another person associated with the Missouri Public Service Commission, the Office of the Public Counsel, Cintex, or Cintex's counsel, as long as the person with access takes responsibility for ensuring that the document is not further shared and any copies except that in EFIS are destroyed; and that such classification is necessary to prevent harm to Cintex, which is consistent with the public interest.

**WHEREFORE,** the Staff moves that the Commission grant it permission to file a document as "Very Highly Confidential" with protections afforded as described above.

Respectfully submitted,

Colleen M. Dale, MoBar 31624

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 751-4255 (Telephone)
cully.dale@psc.mo.gov

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this  $6^{th}$  day of September, 2012.