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

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In the Matter of the Application of Co-Mo Electric Cooperative for Approval of Designated Service Boundaries Within Portions of Cooper County, Missouri

File No.: EO-2022-0190

## STAFF'S RESPONSE TO CO-MO ELECTRIC COOPERATIVE'S MOTION TO MODIFY PROTECTIVE ORDER

Comes now the Staff of the Missouri Public Service Commission ("Staff") and respectfully responds to Co-Mo Electric Cooperative's (Co-Mo) Motion to Modify Protective Order (Motion):

1. On May 6, 2022, Co-Mo filed a Motion to Modify Protective Order *identifying* Richard Fowler as "an additional consultant and *expert* in this matter" (emphasis added) and asking that applicable protective orders be modified to allow him to view highly confidential information upon his submission of a duly signed nondisclosure form.

2. Staff does not object to the request as expressly stated, but Staff does not agree to and objects to any additions to the witness list now filed in this case.

WHEREFORE, the Staff prays that the Commission promptly grant Co-Mo's Motion with the clarification that the order does not allow additions to the witness list on file in this case.

## Respectfully Submitted,

<u>/s/ Paul T. Graham #30416</u> Senior Staff Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Mo 65102-0360 (573) 522-8459 Paul.graham@psc.mo.gov

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## **CERTIFICATE OF SERVICE**

The undersigned by his signature below certifies that the foregoing pleading was served upon all counsel of record on this May 6, 2022 by electronic filing in EFIS, electronic mail, hand-delivery, or U.S. postage prepaid.

/s/ Paul T. Graham