BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of White River Valley Electric Cooperative, Inc. For Approval of Designated Service Boundaries Within Portions of Christian County, Missouri.

Case No. EO-2025-0228

MOTION FOR PROTECTIVE ORDER

COMES NOW White River Valley Electric Cooperative, Inc. ("White River"), 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 White River's Application which requires compliance with 20 CSR 4240-20.045. In support of its motion, Applicant states as follows:

1. White River 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 White River could be injurious to its business and competitive positions.

2. White River has previously filed its Application which requires compliance with 20 CSR 4240-20.045. That regulation requires White River 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. White River will file <u>Appendix E</u> 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, White River respectfully requests that the Commission issue its protective order in this proceeding with respect to White River's highly confidential financial information to be late-filed as <u>Appendix E</u> to White River's Application.

Respectfully submitted,

Mégan E. McCord, #62037 Friel, McCord & Smiley, LLC P.O. Box 14287 Springfield, MO 65814 Telephone: 417-227-8405 Email: mmccord@reclawfirm.com

Attorney for White River Valley Electric Cooperative, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail, on February 19, 2025, to the following:

Office of the Public Counsel 200 Madison Street, Suite 650 P.O. Box 2230 Jefferson City, Missouri 65102 opcservice@ded.mo.gov Missouri Public Service Commission Staff Counsel Department 200 Madison Street, Suite 800 P.O. Box 360 Jefferson City, Missouri 65102 staffcounselservice@psc.mo.gov

/s/ Megan E. McCord