

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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HP 22-002

IN THE MATTER OF THE APPLICATION OF
NAVIGATOR HEARTLAND GREENWAY,
LLC FOR A PERMIT UNDER THE SOUTH
DAKOTA ENERGY CONVERSION AND
TRANSMISSION FACILITIES ACT TO
CONSTRUCT THE HEARTLAND
GREENWAY PIPELINE IN SOUTH DAKOTA,

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**MOTION FOR
PROTECTIVE ORDER**

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Consistent with the provisions of ARSD 20:10:01:39 to 20:10:01:44, Applicant Navigator Heartland Greenway LLC moves that the Commission enter the attached protective order for use by the parties in this proceeding. In the course of discovery to date, Navigator has identified responsive documents that contain confidential and proprietary information. Protecting that information will allow discovery to proceed in an orderly and expeditious way. The proposed protective order is similar to protective orders that the Commission has previously entered in other siting dockets.

Dated this 16th day of February, 2023.

WOODS, FULLER, SHULTZ & SMITH P.C.

By /s/ James E. Moore
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