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RICHARD T. CIOTTONE

July 22, 2003

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**FILED<sup>4</sup>**

JUL 22 2003

Missouri Public  
Service Commission

**Re: Case No. ER-2004-0034**

Dear Mr. Roberts:

Enclosed for filing on behalf of Aquila, Inc. d/b/a Aquila Networks - MPS and Aquila Networks - L&P, please find an original and eight (8) copies of a Motion for Protective Order.

A copy of this filing is being provided to the General Counsel and Office of the Public Counsel.

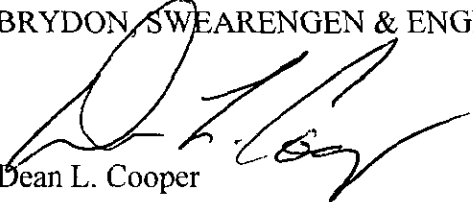
Please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By:

  
Dean L. Cooper

DLC/lar

Enclosure

cc: General Counsel  
Office of the Public Counsel  
Stuart Conrad

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>4</sup>

JUL 22 2003

In the Matter of Aquila, Inc. d/b/a )  
Aquila Networks - L&P and Aquila )  
Networks - MPS to Implement a )  
General Rate Increase in Electricity )

Case No. ER-2004-0034 Missouri Public  
Service Commission

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Aquila, Inc. d/b/a Aquila Networks - MPS and Aquila Networks - L&P (“Aquila” or the “Company”), in accordance with 4 CSR 240-2.085, and, for its motion for issuance of the Missouri Public Service Commission’s (“Commission”) standard-form protective order, states as follows:

1. The Company has filed with the Commission tariffs designed to increase its rates for electric service.

2. The Company may seek to provide in testimony, and anticipates being asked through data requests, to provide competitive pricing information and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be requested or utilized in testimony by other parties may contain customer-specific information, competitive pricing information, trade secrets and confidential, technical, financial and business information, or other material of a confidential or proprietary nature. Additionally, requests may ask for information that is not considered public under the rules of the Securities Exchange Commission. Public disclosure of the referenced material which the Staff, OPC, or others may seek in discovery may tend to harm the interests of the Company, its employees and its customers. None of the information for which a claim or confidentiality will be made can be found in any format in a public document.

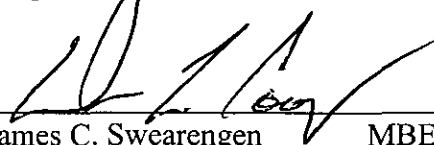
3. Therefore, because there is a potential for public disclosure of confidential or

proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of “highly confidential” and “proprietary.” The Commission has historically issued protective orders in general rate cases.

WHEREFORE, the Company, pursuant to 4 CSR 240-2.085, respectfully requests that the Commission:

- (a) issue the Commission’s standard-form protective order containing classifications of “highly confidential” and “proprietary” to guide the parties’ conduct in this case; and,
- (b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,



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ATTORNEYS FOR AQUILA, INC. D/B/A  
AQUILA NETWORKS - MPS AND  
AQUILA NETWORKS - L&P

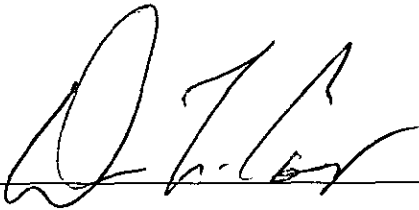
## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered on July 2<sup>nd</sup>, 2003, to the following:

Office of the General Counsel  
Governor Office Building, 8<sup>th</sup> Floor  
Jefferson City, Mo 65101

Office of the Public Counsel  
Governor Office Building, 6<sup>th</sup> Floor  
Jefferson City, MO 65101

Mr. Stuart W. Conrad  
Finnegan, Conrad & Peterson, L.C.  
Penntower Office Center  
3100 Broadway, Suite 1209  
Kansas City, MO 64111



A handwritten signature in black ink, appearing to read "S. W. Conrad", is written over a horizontal line.