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January 20, 2004

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

**FILED<sup>2</sup>**

JAN 20 2004

Missouri Public  
Service Commission

RE: Aquila, Inc. d/b/a Aquila Networks – MPS  
Case No. GR-2003-0311

Dear Mr. Roberts:


Enclosed are the original and eight (8) copies of a Motion for Protective Order for filing in the above-referenced matter. A copy of the foregoing Motion has been served on all parties in this matter.

If you have any questions concerning this matter, please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

  
Dean L. Cooper

DLC/jar

Enclosures

cc: Doug Micheel, OPC  
Dana K. Joyce, General Counsel

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

**FILED<sup>2</sup>**  
JAN 20 2004

In the Matter of Aquila, Inc. d/b/a	)	
Aquila Networks - MPS's Purchased	)	Case No. GR-2003-0311
Gas Factors to be Reviewed in its	)	
2002-2003 Actual Cost Adjustment.	)	

**Missouri Public  
Service Commission**

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Aquila, Inc. d/b/a Aquila Networks - MPS ("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:

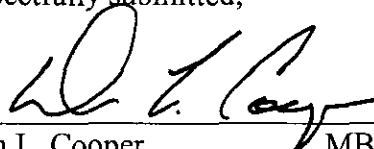
1. The Company may seek to provide in testimony, and anticipates being asked through data requests, to provide competitive pricing information and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be 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. 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.

2. 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."

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,



Dean L. Cooper MBE#36592  
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ATTORNEYS FOR AQUILA, INC. D/B/A  
AQUILA NETWORKS - MPS

#### CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered on January ~~10~~ 19, 2004, 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

