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July 11, 2002

Executive Secretary Public Service Commission P. O. Box 360 Jefferson City, MO 65102

JUL 1 1 2002

RE: Case No. GR-2000-425

Missouri Public Service Commission

Good morning:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of Missouri Gas Energy's Motion for Protective Order.

If you have any questions, please give me a call.

Sincerely yours,

Gary W. Duffy

Enclosures cc w/encl:

Doug Micheel, Office of Public Counsel Tim Schwarz, Office of the General Counsel Jeff Keevil Rob Hack Mike Langston

00-425pomotcov/gdmydocs/wp8

FILED³

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

JUL 1 1 2002

Missouri Public

		Sarvice Commission
In the Matter of Missouri Gas Energy's)	
Purchased Gas Cost Adjustment Factors)	
to be Reviewed in its 1999-2000 Actual)	Case No. GR-2000-425
Cost Adjustment.)	

MOTION FOR PROTECTIVE ORDER

Comes now Missouri Gas Energy ("MGE"), by and through its counsel, pursuant to 4 CSR 240-2.085, and for its motion respectfully states as follows:

- 1. As the caption indicates, this is an Actual Cost Adjustment proceeding in which the gas costs and revenues of MGE are examined for a twelve month period. As a part of this process, certain gas supply contracts or documents detailing contracting strategies may be disclosed in response to discovery. There may also be customer-specific information, accounting or financial information that is not available to the general public, and other material which would meet the definition of HIGHLY CONFIDENTIAL material in the Commission's standard protective order.
- 2. The Commission has long recognized in ACA cases that it is appropriate to issue protective orders to preserve the confidentiality of certain types of information in such proceedings. The public dissemination of private contract information, for example, could lead to adverse consequences for MGE, its customers, and members of the public, by revealing information which could result in higher prices being paid than would otherwise be required.
 - 3. MGE therefore requests that the Commission issue in this case what has

become known generally as its "standard form" protective order which contains both Highly Confidential and Proprietary categories so that MGE may respond to data requests in a confidential manner if a particular response so qualifies.

4. MGE attempts to ensure that none of the information for which a claim of confidentiality is made can be found in any format in any other public document, and MGE declassifies material which has previously been confidential if the circumstances permit.

WHEREFORE, MGE moves that the Commission issue its standard form protective order in this case.

Respectfully submitted,

Gary W. Duff♥

MBE #24905

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served this 11th day of July, 2002, by either hand delivery or placement of same with the United States Postal Service in Jefferson City, Missouri, first class postage prepaid, to the counsel listed below.

Gary W. Duffy

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