

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

In the Matter of Missouri Gas Energy's Purchased)
Gas Adjustment (PGA) Factors to be Audited in its) Case No. GR-2005-0169
2004-2005 Actual Cost Adjustment.)

MOTION FOR PROTECTIVE ORDER

COMES NOW Missouri Gas Energy, division of Southern Union Company (MGE or 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:

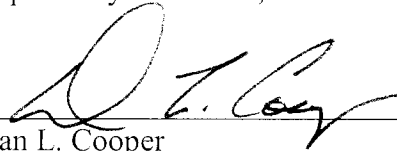
1. The Company may seek to provide in testimony, and anticipates being asked through Commission Staff (Staff) data requests, to provide competitive pricing information and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be requested or utilized in testimony by the Staff, as well as the Office of the Public Counsel (Public Counsel) or other intervenors, 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, Public Counsel, 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,



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ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on January 3, 2005, to the following:

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