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May 29, 2003

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

RE: Case No. GR-2003-0517

FILED²
MAY 2 9 2003

Service Commission

Dear Mr. Roberts:

Enclosed please find an original and eight copies of a Motion for Protective Order filed on behalf of AmerenUE. Please file stamp the enclosed extra receipt copy and return to me for my records.

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

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

DLC/tli Enclosures

CC.

General Counsels Office Office of the Public Counsel

Thomas Byrne

FILED²
MAY 2 9 2003

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company, d/b/a AmerenUE, for Authority to File)	Service Com	Public mission
Tariffs Increasing Rates for Gas Service)	Case No. GR-2003-0517	
Provided to Customers in the Company's Missouri Service Area.)		
IVIISSOUIT DELVICE ALEA.)		

MOTION FOR PROTECTIVE ORDER

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE" 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 natural gas 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,

Gary W. Duffy Dean L. Cooper

MBE#24905

er MBE#36592

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Certificate of Service

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