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July 11, 2002

**FILED<sup>3</sup>**

JUL 11 2002

Missouri Public  
Service Commission

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

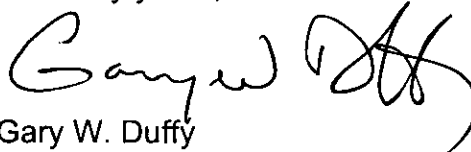
**RE: Case No. GR-99-304**

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

99-304pomotcov/gdmydocs/wp8

FILED<sup>3</sup>

JUL 11 2002

Missouri Public  
Service Commission

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

In the Matter of Missouri Gas Energy's  
Purchased Gas Cost Adjustment Factors  
to be Reviewed in its 1998-1999 Actual  
Cost Adjustment.

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)  
)

Case No. GR-99-304

**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.

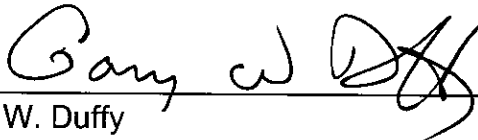
Respectfully submitted,



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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.



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