

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION

312 EAST CAPITOL AVENUE

P.O. BOX 456

JEFFERSON CITY, MISSOURI 65102-0456

TELEPHONE (573) 635-7166

FACSIMILE (573) 635-0427

Email: PAULB@BRYDONLAW.COM

DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN

DEAN COOPER
CHARLES E. SMARR
MARK G. ANDERSON
BRIAN T. MCCARTNEY
GREGORY C. MITCHELL
DIANA C. FARR
JANET E. WHEELER

OF COUNSEL
RICHARD T. CIOTTONE

August 13, 2003

VIA HAND DELIVERY

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

FILED³
AUG 13 2003
Missouri Public
Service Commission

**Re: Southern Union Company d/b/a Missouri Gas Energy
Case No. GO-2003-0354**

Dear Mr. Roberts:

On behalf of Southern Union Company, I deliver herewith an original and eight (8) copies of a **Motion for Protective Order** for filing with the Commission in the referenced matter. I would appreciate it if you would see that the copies are distributed to the appropriate Commission personnel. Service copies have been mailed or hand-delivered this date.

I have also enclosed an extra copy of the document which I request that you stamp "Filed" and return to the person delivering it to you.

Thank you for your attention in this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:



Paul A. Boudreau

PAB/ccp
Enclosures
cc: All parties of record

FILED³

AUG 13 2003

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Transfer of Assets,)
including much of Southern Union's gas)
supply department to EnergyWorx, a wholly)
owned subsidiary.)

Case No. GO-2003-0354

MOTION FOR PROTECTIVE ORDER

COMES NOW, Southern Union Company (d/b/a Missouri Gas Energy), pursuant to 4 CSR 240-2.085, and requests that the Commission issue its customary protective order in the referenced case.

1. Southern Union Company requests a protective order in this case to facilitate the prompt exchange of information between Southern Union Company and the Commission's Staff. Southern Union Company anticipates that the Staff may submit data requests to the company requesting information that is non-public and may be related to business plans or practices.

2. None of the materials identified by Southern Union Company under the terms of the Commission's protective order as being highly confidential or proprietary will be materials that can be found in any format in any public document.

WHEREFORE, for good cause shown, Southern Union Company requests that the Commission issue its customary protective order in the captioned case.

Respectfully submitted,



Paul A. Boudreau MO #33155
BRYDON, SWEARENGEN & ENGLAND, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102
(573) 635-7166

Attorneys for Southern Union Company

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail or by hand delivery, on this 13th day of August 2003 to the following:

Ms. Lera L. Shemwell
Office of the General Counsel
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102-0360

Mr. Douglas Micheel
Deputy Public Counsel
Office of the Public Counsel
200 Madison Street, Suite 650
P.O. Box 7800
Jefferson City, MO 65102

