



Martha S. Hogerty
Public Counsel

State of Missouri

Mel Carnahan
Governor

Office of the Public Counsel
Harry S Truman Building - Ste.
250
P.O. Box 7800
Jefferson City, Missouri 65102

Telephone: 573-751-4857
Facsimile: 573-751-5562
Web: <http://www.mo-opc.org>
Relay Missouri
1-800-735-2966 TDD
1-800-735-2466 Voice

June 1, 2000

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

FILED²
JUN 1 2000
Missouri Public
Service Commission


Re: UtiliCorp United Inc. and St. Joseph Light & Power Company
Case No. EM-2000-292

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **Joint Motion for Modification of Protective Order**. Please "file" stamp the extra enclosed copy and return it to this office.

Thank you for attention to this matter.

Sincerely,


John B. Coffman
Deputy Public Counsel

JBC:jb

cc: Counsel of Record

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

FILED²
JUN 1 2000
Missouri Public
Service Commission

In the Matter Of The Joint Application Of)
UtiliCorp United Inc. and St. Joseph Light)
& Power Company For Authority To Merge)
St. Joseph Light & Power Company With)
And Into UtiliCorp United Inc. and, In)
Connection Therewith Certain Other)
Related Transactions)

Case No. EM-2000-292

JOINT MOTION FOR MODIFICATION OF PROTECTIVE ORDER

Comes Now the Office of the Public Counsel (Public Counsel), the Staff of the Missouri Public Service Commission (Staff), UtiliCorp United Inc. (UtiliCorp) and St. Joseph Light & Power Company (SJLP) and for their Motion state as follows:

1. In its Order Denying Motion to Consolidate in Establishing Procedural Schedule, the Public Service Commission (Commission) acknowledged that the SJLP - UtiliCorp merger case (Case No. EM-2000-292) and The Empire District Electric Company (Empire) – UtiliCorp merger case (Case No. EM-2000-369) share many common issues of fact and law. On page 4 of this Order, the Commission also stated:

The Commission is concerned about the need to economize on the use of the regulatory resources of the Commission and the Public Counsel, as well as the resources of the applicants and intervenors. The parties are encouraged to take advantage of any opportunities that may arise to utilize discovery and testimony that are common to both cases.

2. Public Counsel and Staff have identified numerous data requests responses that have been answered by UtiliCorp in this docket which they believe would be relevant to the common issues of fact and law that are likely to be brought up in Case No. EM-2000-369, many of which have been labeled Highly Confidential or Proprietary by UtiliCorp. Although it would

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be possible for Public Counsel and Staff to seek the very same responses from UtiliCorp in the other merger case, it would require a tremendous amount of time, effort and resources to be generated when the information is already in Public Counsel's and Staff's possession. Public Counsel, Staff, UtiliCorp and SJLP believe that certain intervenors in these cases are similarly situated. This duplication would apparently be required by Paragraph S of the Protective Order issued by the Commission in this case which states as follows:

S. All persons who are afforded access to information under the terms of this Protective Order shall neither use nor disclose such information for purposes of business or competition or any other purpose other than the purpose of preparation for and conduct of this proceeding and then solely as contemplated herein, and shall keep the information secure and in accordance with the purposes and intent of this order.

Order Establishing Protective Order, October 25, 1999 Attachment A, page 7.

3. Public Counsel, Staff, and UtiliCorp, believe and SJLP does not contest that considerable time, effort and resources would be saved on their parts if the Commission were to modify its Protective Order in this case to state that the parties to this merger case may utilize, in Case No. EM-2000-369, any data request responses answered by UtiliCorp in this case, as well as data request responses answered by SJLP in this case, which are not designated as Highly Confidential or Proprietary by SJLP, provided that such information is subject to the terms and conditions of the Protective Order issued in said Case No. EM-2000-369.

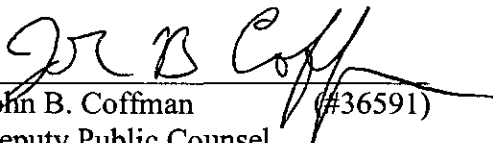
The amendment of the Protective Order being requested in this Joint Motion applies to material designated as Highly Confidential or Proprietary by UtiliCorp, but does not apply to material designated as Highly Confidential or Proprietary by SJLP.

WHEREFORE, Public Counsel, Staff, UtiliCorp and SJLP respectfully move the Commission to modify its Protective Order in this case to state that the parties to this merger


case may utilize in Case No. EM-2000-369 any data request responses answered by UtiliCorp in this case, as well as data request responses answered by SJLP in this case which are not designated as Highly Confidential or Proprietary by SJLP, provided that any such information is subject to the terms and conditions of the Protective Order issued in said Case No. EM-2000-369.

Respectfully submitted,

OFFICE OF THE Public Counsel

By: 
John B. Coffman (#36591)
Deputy Public Counsel
P. O. Box 7800
Jefferson City, MO 65102
(573) 751-5565
(573) 751-5562 (Fax)

STAFF OF THE MISSOURI PUBLIC SERVICE
COMMISSION

By: 
Steven Dottheim (#29149)
Chief Deputy General Counsel
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7489
(573) 751-9285 (Fax)

UTILICORP UNITED INC.

By: James C. Swearngen *by JCS*
James C. Swearngen (#21510)
Brydon, Swearngen & England P.C.
P. O. Box 456
Jefferson City, MO 65102-0456
(573) 635-7166
(573) 635-0427 (Fax)

ST. JOSEPH LIGHT & POWER COMPANY

By: Mark W. Comley *by JCS*
Mark W. Comley (#28847)
601 Monroe Street
Jefferson City, MO 65101
(573) 634-2266
(573) 636-3306 (Fax)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 1st day of June, 2000:

James Swearengen
Brydon, Swearengen & England
P. O. Box 456
Jefferson City, MO 65102

Jeffrey Keevil
Stewart & Keevil
1001 Cherry St., Suite 302
Columbia, MO 65201

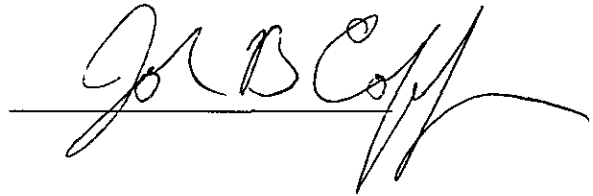
Stuart W. Conrad
Finnegan, Conrad and Peterson
1209 Penntower Office Bldg.
3100 Broadway
Kansas City, MO 64111

William Niehoff
Union Electric Company
P. O. Box 66149
St. Louis, MO 63166

Steven Dottheim
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Shelley Woods
Assistant Attorney General
P. O. Box 176
Jefferson City, MO 65102

Mark W. Comley
Newman, Comley & Ruth
601 Monroe St., Suite 301
Jefferson City, MO 65101

A handwritten signature in cursive script, appearing to read "J B Coffey", is written over a horizontal line.