

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

In the Matter of the Application of)
Missouri-American Water Company,)
for the approval of an Agreement with the)
City of Kirkwood, Missouri to Construct) Case No. WO-2005
Transmission Mains and Points of Delivery)
and to Sell and Deliver Water for Resale)
and Related Tariff Sheets.)

MOTION FOR PROTECTIVE ORDER

COMES NOW Missouri-American Water Company (“MAWC”) and moves the Commission to issue its standard-form protective order. In support thereof, MAWC respectfully states to the Missouri Public Service Commission (“Commission”) as follows:

1. MAWC has filed with the Commission an application for approval of an agreement with the City of Kirkwood. The agreement provides for the construction of transmission mains and points of delivery and provides for the sale and delivery of water.

2. Information which may be requested during the Staff’s investigation, discovery initiated by the Office of Public Counsel (“Public Counsel”) and discovery initiated 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. Public disclosure of the material which the Staff, Public Counsel, or others may seek in discovery may tend to harm the interests of MAWC and/or their customers.

3. An executed copy of the agreement between MAWC and Kirkwood is attached to the application of the parties as Appendix A. It is the parties’ intention to designate this appendix as Highly Confidential, after a protective order has been issued.

4. Therefore, because of the potential for public disclosure of such information without a protective order in place, MAWC moves the Commission to issue in this case its standard-form protective order containing classifications of “highly confidential” and “proprietary.”

WHEREFORE, MAWC 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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