

ROBERT J. HACK Vice President, Pricing & Regulatory Affairs

February 26, 2001

FILED
MAR 1 2001

Missouri Public

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, Missouri 65102-0360

RE: Case No. GR-2001-382, Missouri Gas Energy

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter, please find an original and eight (8) conformed copies of Missouri Gas Energy's Supplemental Motion for Protective Order.

A copy of this filing has been mailed or hand-delivered this date to counsel of record.

Thank you for bringing this matter to the attention of the Commission. Please call me if you have any questions regarding this matter.

Sincerely,

C: F. Jay Cummings
James B. Deutsh
Henry Herschel
Douglas E. Micheel
Thomas R. Schwarz, Jr.
Gary W. Duffy
Jeffrey A. Keevil

**Enclosures** 

FILED
MAR 1 2001

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

Missouri Public Service Commission

In the matter of Missouri Gas Energy's	)	
Purchased gas adjustment to be reviewed	)	Case No. GR-2001-382
In its 2000-2001 Actual Cost Adjustment.	)	

## MISSOURI GAS ENERGY'S SUPPLEMENTAL MOTION FOR PROTECTIVE ORDER

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and for its supplemental motion pursuant to 4 CSR 240-2.085 respectfully states the following:

- 1. Parties have requested documents or other material from MGE during this proceeding which contains sensitive information that should be protected from public disclosure. Such information requested to date includes gas supply, transportation and storage contracts and information concerning MGE's administration of those contracts. Public disclosure of such information could impair MGE's ability to obtain favorable prices, terms and conditions for such services in the future, to the detriment of MGE's customers. As always, MGE will endeavor to ensure that no claim of confidentiality is made for information which can be found in any format in a public document.
- 2. To protect such sensitive information from public disclosure, MGE suggests that it is appropriate for the Commission to issue its standard protective order.

Wherefore, MGE respectfully requests that the Commission issu its standard

protective order.

Respectfully Submitted,

Robert J. I

MBE #36496

3420 Broadway

Kansas City, MO 64111

(816)360-5755

FAX: (816)360-5536

e-mail: rob.hack@southernunionco.com

ATTORNEY FOR MISSOURI GAS ENERGY

## Certificate of Service

I hereby certify that a copy of the foregoing document was mailed or hand delivered this 26th day of February, 2001, to:

James B. Deutsh/Henry Herschel Blitz, Bardgett & Deutsch, L.C. 308 E. High Street, Suite 301 Jefferson City, MO 65101 Douglas E. Micheel Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Thomas R. Schwarz, Jr. Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102 Gary W. Duffy P.O. Box 456 Jefferson City, MO 65102

Jeffrey A. Keevil Stewart & Keevil 1000 Cherry, Ste. 302 Columbia, MO 65201

Rohnt J Hack