

LAW OFFICES  
**BRYDON, SWEARENGEN & ENGLAND**  
PROFESSIONAL CORPORATION

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

312 EAST CAPITOL AVENUE  
P.O. BOX 456  
JEFFERSON CITY, MISSOURI 65102-0456  
TELEPHONE (573) 635-7186  
FACSIMILE (573) 636-6450 OR 635-0427  
E-MAIL: PBODREAU@MAIL.ULTRAWEBS.NET

DEAN L. COOPER  
MARK G. ANDERSON  
TIMOTHY T. STEWART  
GREGORY C. MITCHELL  
RACHEL M. CRAIG  
BRIAN T. MCCARTNEY  
DALE T. SMITH

August 27, 1999

**FILED<sup>2</sup>**

**AUG 27 1999**

Missouri Public  
Service Commission

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

**Re: Southern Union Company/Pennsylvania Enterprises, Inc.  
Case No. GM-2000-49**

Dear Mr. Roberts:

On behalf of Southern Union Company, I deliver herewith an original and fourteen (14) copies of a Motion for Protective Order for filing with the Commission in the referenced matter.

I have enclosed a receipt copy which I request that you stamp "Filed" and return to the messenger delivering same to you.

Thank you for your attention in this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Paul A. Boudreau

PAB/aw  
Enclosures  
cc: The Office of Public Counsel

FILED<sup>2</sup>

STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION

AUG 27 1999

Missouri Public  
Service Commission

In the Matter of the Application of )  
Southern Union Company for Authority )  
to Acquire up to and Including Five ) Case No. GM-2000-49  
Percent (5%) of the Common Stock of )  
Pennsylvania Enterprises, Inc. )

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Southern Union Company ("Southern Union") and for its Motion that the Missouri Public Service Commission ("Commission") issue its customary Protective Order in the captioned case, states as follows:

1. On July 20, 1999, Southern Union filed an Application for authority to acquire up and including five percent (5%) of the common stock of Pennsylvania Enterprises, Inc. ("PNT"). This Application was filed in conjunction with a separate Application for authority for Southern Union and PNT to pursue a statutory merger, which companion case has been docketed by the Commission as Case No. GM-2000-43.

2. Subsequent to the filing of a July 29, 1999, Staff Recommendation, the Commission issued an Order Approving Application with Additional Conditions on July 29, 1999, which Order was subsequently modified by an Order dated 24, 1999.

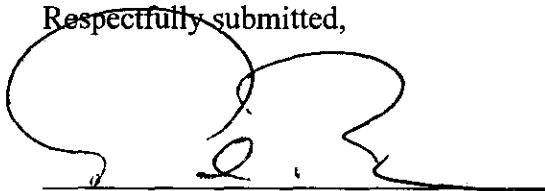
3. The conditions established by the Commission require that Southern Union periodically file certain financial documentation associated with the investments made by Southern Union pursuant to the Commission's approval. Because the information required to be filed by Southern Union is likely to include information which is considered to be confidential or proprietary in nature, Southern Union requests that the Commission issue its customary Protective Order to facilitate prompt compliance with the Commission's various filing requirements set forth in the July

15

29, 1999, Order Approving Application with Additional Conditions.

WHEREFORE, for good cause shown, Southern Union requests that the Commission issue its customary Protective Order in the captioned cause.

Respectfully submitted,



Paul A. Boudreau #33155  
BRYDON, SWEARENGEN & ENGLAND P.C.  
P.O. Box 456  
Jefferson City, MO 65102-0456  
(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 sent by U.S. Mail, postage prepaid, or hand-delivered, on this 27<sup>th</sup> day of August 1999, to:

The Office of the Public Counsel  
Truman Building, Room 250  
P.O. Box 7800  
Jefferson City, MO 65102-7800

