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July 20, 2000

Mr. Dale Hardy Roberts
Executive Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED²

JUL 20 2000

Missouri Public
Service Commission

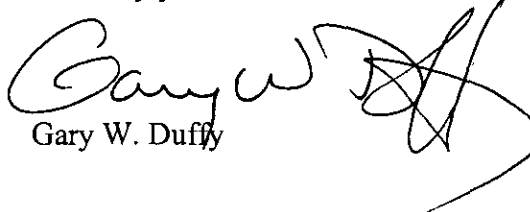
RE: ES-2000-845

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of Motion for Issuance of Protective Order.

If you have any questions, please give me a call.

Sincerely yours,


Gary W. Duffy

Enclosures

cc: Office of General Counsel
Office of Public Counsel
Stuart Conrad
Tim Rush
Gary Myers

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²
JUL 20 2000

In the matter of the Application of St. Joseph)
Light & Power Company for the Issuance of)
an Accounting Authority Order Relating to its)
Electrical Operations.)

Missouri Public
Service Commission
Case No. EO-2000-845

MOTION FOR ISSUANCE OF PROTECTIVE ORDER

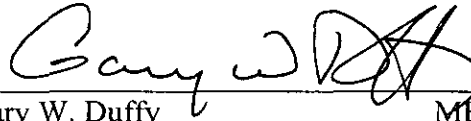
Comes now St. Joseph Light & Power Company ("SJLP"), by and through its counsel,
and for its Motion respectfully states as follows:

1. SJLP has received data requests from the Staff of the Commission and the Office of the Public Counsel in this case. The scope of existing and future data requests in this proceeding can be expected to include accounting information which is not available to the general public, information regarding competitive bids solicited from third parties, information which may have a bearing on future litigation, and other information which comes within the criteria the Commission uses in defining proprietary or highly confidential information. The public dissemination of such information could lead to adverse consequences to SJLP and its customers.

2. SJLP therefore requests that the Commission issue in this case what has become known generally as its "standard form" protective order which contains both Highly Confidential and Proprietary categories so that SJLP may respond to these data requests in a confidential manner if a particular response so qualifies.

WHEREFORE, SJLP requests an order from the Commission issuing a Protective Order in this case.

Respectfully submitted,



Gary W. Duffy MBE #24905

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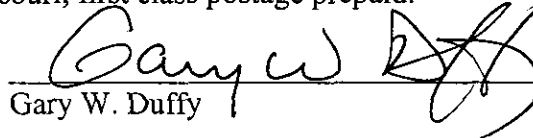
(573) 635-3847 (facsimile)

Attorneys for

St. Joseph Light & Power Company

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served this 20th day of July, 2000, by either hand delivery or placement of same with the United States Postal Service in Jefferson City, Missouri, first class postage prepaid.


Gary W. Duffy

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Jefferson City, Missouri

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