

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

Staff of the Missouri Public Service Commission,	)	
	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. GC-2006-_____
	)	
Missouri Pipeline Company, LLC; Missouri Gas Company, LLC; Omega Pipeline Company, LLC; Mogas Energy, LLC; United Pipeline Systems, Inc.; and Gateway Pipeline Company, LLC.	)	
	)	
Respondents.	)	

**MOTION FOR PROTECTIVE ORDER**

COMES NOW the Staff of the Missouri Public Service Commission and pursuant to 4 CSR 240-2.085 moves the Missouri Public Service Commission to issue its standard Protective Order in this case on the following grounds:

1. This case involves Staff's Complaint consisting of four counts alleging excessive earnings, violation of the Commission's affiliate transactions rules, failure to obtain Commission authorization prior to pledging assets and assertion of jurisdiction over Gateway Pipeline Company, and other.

2. Much of the information provided to Staff in the preliminary audit of these companies is stamped "Highly Confidential."

3. Staff anticipates that responses to additional data requests may likely include competitive pricing information, technical, financial or business information of a confidential or proprietary nature.

4. Disclosure by Staff of confidential information furnished by jurisdictional Companies is prohibited by §386.480 RSMo (2000).

5. Issuance of a protective order is expected to help to minimize discovery disputes, and has provided a sound method for submitting confidential information to the Commission.

WHEREFORE, Staff respectfully requests the Commission to issue its standard Protective Order in this docket.

Respectfully submitted,

**/s/ Lera L. Shemwell**

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Senior Counsel  
Missouri Bar No. 43792

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#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 31<sup>st</sup> day of March, 2006.

**/s/ Lera L. Shemwell**