

December 8, 2000

**FILED**

**DEC 11 2000**



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

**Missouri Public  
Service Commission**

Re: Case No. GR-2000-579

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) copies of Union Electric's Motion For Protective Order.

Kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed envelope.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas M. Byrne", written in a cursive style.

Thomas M. Byrne  
Associate General Counsel

TMB/sjs  
Enclosure(s)

cc: Office of the Public Counsel  
All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

DEC 11 2000

Missouri Public  
Service Commission

In the Matter of Union Electric Company )  
d/b/a AmerenUE's Gas Adjustment Factors )  
to be Reviewed in its 1999-2000 Actual )  
Cost Adjustment. )

Case No. GR-2000-579

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE"), by and through its counsel, and hereby moves the Missouri Public Service Commission ("Commission") to issue its standard Protective Order in this docket on the following grounds:

1. The Commission established this docket for consideration of AmerenUE's tariffs reflecting AmerenUE's revised actual cost adjustment component of its purchased gas adjustment rates.
2. Based on prior experience in similar proceedings, AmerenUE anticipates that responses to discovery requests from the parties to this docket may contain highly confidential or proprietary information. The issuance of a protective order now should avoid delays in obtaining responses to discovery.
3. The Commission has recognized in numerous dockets that there is a genuine need to protect certain confidential information from disclosure. The issuance of protective orders in prior cases has helped to minimize disputes and has provided a sound method for submitting confidential information.

WHEREFORE, AmerenUE respectfully requests that the Commission issue its standard Protective Order in this case.

Respectfully submitted,

UNION ELECTRIC COMPANY  
d/b/a AmerenUE

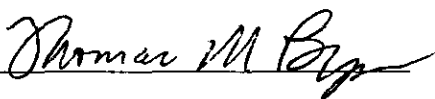
By Thomas M. Byrne  
Its Attorney  
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Ameren Services Company  
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St. Louis, MO 63166-6149  
(314) 554-2514  
(314) 554-4014 (fax)  
tbyrne@ameren.com

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed to the following counsel on  
this 8th day of December, 2000.

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Office of Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

  
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