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

In the matter of an Investigation into the Tree Trimming Policies of Union Electric Company d/b/a AmerenUE.

) Case No. EW-2004-0583

## **MOTION FOR PROTECTIVE ORDER**

**COMES NOW** Union Electric Company d/b/a AmerenUE ("AmerenUE" or the "Company"), in accordance with 4 CSR 240-2.085, and, for its Motion for issuance of the Missouri Public Service Commission's ("Commission") standard-form protective order, states as follows:

1. The Company has been ordered to file quarterly reports in this docket, in order to update the Commission and its Staff on AmerenUE's progress on its Metro Tree-Trimming Schedule and an its Other Area Tree Trimming Schedule.

2. The Company, in these reports, provides certain information as to the contractors it uses for this work. This information is "Proprietary" as defined in the Commission's standard-form protective order in that it includes confidential or private technical financial and business information relating to services contracted for by AmerenUE. AmerenUE does not share the contractor's business plans and seeks to maintain the confidentiality of this information so as to not reveal this information among competitive contractors. None of the information for which a claim of confidentiality will be made can be found in any format in a public document.

3. Therefore, because there is a potential for public disclosure of highly confidential or proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary." The Commission has historically issued protective orders in general rate cases and other cases similar to the present one.

**WHEREFORE**, the Company, pursuant to 4 CSR 240-2.085, respectfully requests that the Commission:

(a) issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case; and,

(b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,

UNION ELECTRIC COMPANY d/b/a AmerenUE

By <u>Moman M. M.</u> Its Attorney

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Dated: September 15, 2005

## **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via electronic mail on this 15<sup>th</sup> day of September, 2005, on the following parties of record:

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