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November 1, 2001

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DALE HARDY ROBERTS Secretary/Chief Regulatory Law Judge

> DANA K. JOYCE General Counsel

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

RE: Case No. GR-2000-573

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a MOTION FOR PROTECTIVE ORDER.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Dennis L. Frey

Associate General Counsel

Service Commission

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DLF:ccl Enclosure

cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



In the matter of Atmos Energy)	Missouri Public Service Commission
Corporation's Purchased Gas Adjustment)	
to be Reviewed in its 1999-2000 Actual)	Case No. GR-2000-573
Cost Adjustment)	

MOTION FOR PROTECTIVE ORDER

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and respectfully requests that the Commission issue a Protective Order in this proceeding. In support of this Motion, the Staff states as follows:

- This case involves Atmos Energy Corporation's ("Atmos" or "Company")
 Purchased Gas Adjustment factors to be reviewed in its 1999-2000 Actual Cost
 Adjustment.
- 2. Atmos has already requested that some of the information contained in a Staff Recommendation being filed concurrent with this Motion not be made public. Moreover, the Company may claim that additional information should be protected, although it is relevant to the proceeding, because it is either: (a) "proprietary" in that the information contains trade secrets, as well as confidential or private technical, financial, and business information; or (b) "highly confidential" in that it concerns (1) material or documents that contain information relating directly to specific customers; or (2) market-specific information relating to services offered in competition with other parties or non-parties. Among other things, such information may contain: customer-specific information, competitive pricing information, trade secrets, confidential technical financial and business information or other material of a confidential proprietary nature.

3. The information for which protection is currently sought, and which is contained in the aforementioned concurrently filed Staff recommendation, will become publicly available through that filing, as well as through subsequent proceedings in this case, unless a protective order is in place. Staff anticipates that Atmos will allege that the public disclosure of this information and possibly additional information will harm the Company's business interests, and that the information subject to the proposed Protective Order will not be found in any publicly available document.

4. Counsel for the Company and Office of the Public Counsel have no objection to this request for a standard Protective Order.

WHEREFORE, pursuant to 4 CSR 240-2.085, the Staff respectfully requests that the Commission issue in this proceeding its standard Protective Order, containing both the Highly Confidential and Proprietary categories.

Respectfully submitted,

DANA K. JOYCE General Counsel

Dennis L. Frey

Associate General Counsel

Missouri Bar No. 44697

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 1st day of November 2001.

Service List for Case No. GR-2000-573 Revised: October 30, 2001 (ccl)

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