LAW OFFICES

BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION

312 EAST CAPITOL AVENUE

P.O. BOX 456

JEFFERSON CITY, MISSOURI 65102-0456

TELEPHONE (573) 635-7166

FACSIMILE (573) 635-0427

Email: PAULB@BRYDONLAW.COM

DEAN COOPER MARK G. ANDERSON TIMOTHY T. STEWART GREGORY C. MITCHELL

BRIAN T. MCCARTNEY

BRIAN K. BOGARD

OF COUNSEL

RICHARD T. CIOTTONE

FILED

DEC 2 7 2001

Missouri Public Service Commission

December 27, 2001

Mr. Dale Hardy Roberts, Secretary Public Service Commission Governor Office Building 200 Madison Street, Suite 100 P.O. Box 360 Jefferson City, MO 65102-0360

Re:

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A. BOUDREAU

SONDRA B. MORGAN CHARLES E. SMARR

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

UtiliCorp United Inc.

Case No. EM-2002-297

Dear Mr. Roberts:

On behalf of UtiliCorp United Inc., enclosed for filing in the above-referenced case please find an original and eight (8) copies of a <u>Motion for Protective Order</u>. A copy has also been hand-delivered to the Office of the Public Counsel this date.

Thank you for your assistance with this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By:

Paul A. Boudreau

PAB/aw

Enclosures

cc: Office of the Public Counsel

FILE DEC 2 7 2001

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

•	- 4001
	Service Commission
	207

In the Matter of the Application of UtiliCorp
United Inc., a Delaware Corporation, for
Authority to Merge to Effect a Name Change.

) Case No. EM-2002-297

MOTION FOR PROTECTIVE ORDER

COMES NOW UtiliCorp United Inc. ("UtiliCorp"), pursuant to Missouri Public Service Commission ("Commission") rule 4 C.S.R. 240-2.085, and requests that the Commission issue a Protective Order in the captioned docket. In support thereof, UtiliCorp states that:

- 1. On December 21, 2001, UtiliCorp caused to be filed with the Commission an Application for approval of a merger pursuant to which it plans to effect a name change.
- 2. <u>Appendix 4</u> to the Agreement is a statement of pending customer service complaints, a document required to be filed with the Commission pursuant to 4 C.S.R. 240-2.060(1)(k). The statement contains customer specific information considered by UtiliCorp to be confidential. Its contents have not otherwise been made available for public review. Consequently, <u>Appendix 4</u> was filed under seal.

WHEREFORE, for good cause shown, UtiliCorp requests the Commission issue its customary protective order in this case to provide for the orderly exchange of sensitive information between any proper parties to the case.

Respectfully submitted,

Paul A. Boudreau

#33155

BRYDON, SWEARENGEN & ENGLAND, P.C.

312 East Capitol Avenue

P.O. Box 456

Jefferson City, MO 65102

Telephone: (573) 635-7166 Facsimile: (573) 635-0427

E-Mail: PaulB@brydonlaw.com

Attorneys for UtiliCorp United Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered, on this 27th day of December, 2001, to:

Office of the General Counsel Missouri Public Service Commission Governor Office Building 200 Madison Street P.O. Box 360 Jefferson City, MO 65102

Office of the Public Counsel Governor Office Building 200 Madison Street, Suite 650 P.O. Box 7800 Jefferson City, MO 65102

Paul A. Boudreau