

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

In the Matter of the Application of Southern)
Union Company d/b/a Missouri Gas Energy)
for Authority to Acquire Directly or Indirectly,)
up to and including Fifty Percent (50%) of)
the Equity Interest of CrossCountry Energy,)
LLC, and to Take All Other Actions)
Reasonably Necessary to Effectuate Said)
Transaction)

Case No. GO-2005-0019

MOTION FOR PROTECTIVE ORDER

Comes now Southern Union Company d/b/a Missouri Gas Energy ("Southern Union"), by and through counsel, pursuant to Commission rule 4 CSR 240-2.085 and requests the Commission to issue its customary Protective Order to govern the exchange of information as between parties to the captioned proceeding. In support thereof, Southern Union states as follows:

1. Contemporaneously with the filing of this Motion, Southern Union has caused to be filed an Application with the Commission for authority to acquire up to and including fifty percent (50%) of the equity interests of CrossCountry Energy, LLC.

2. This case may involve, among other things, an examination of financial information to be provided by Southern Union that has not yet been made available for examination by the general public and, as a publicly traded company, Southern Union may not make public other than in accordance with the rules and regulations of the federal Securities and Exchange Commission. Also, some of the transaction documentation contains confidential business information that is market-sensitive.

3. More generally, the Commission's Protective Order in this case will facilitate the timely exchange of information relevant to the review of Southern Union's Application by the Commission's Staff and the Office of the Public Counsel.

WHEREFORE, for good cause shown, Southern Union requests that the Commission issue its customary Protective Order and for such further orders and relief as are appropriate in the circumstances.

Respectfully submitted,

/s/ Paul A. Boudreau
James C. Swearengen MO #21510
Paul A. Boudreau MO #33155
BRYDON, SWEARENGEN & ENGLAND, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102
(573) 635-7166

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail or by hand delivery, on this 14th day of July 2004 to the following:

Mr. Dana K. Joyce, General Counsel
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102-0360

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

/s/ Paul A. Boudreau