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December 15, 1999

FILED³

DEC 15 1999

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

Missouri Public
Service Commission

Re: UtiliCorp United Inc. and The Empire District Electric Company
Case No. EM-2000-369

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and fourteen copies of a Motion for Issuance of Protective Order.


Would you please see that this filing is brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:


James C. Swearngen

JCS/rhg
Enclosures
cc: Office of the Public Counsel

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

FILED³

DEC 15 1999

In the matter of the Joint Application of)
UtiliCorp United Inc. and The Empire)
District Electric Company for authority)
to merge The Empire District Electric)
Company with and into UtiliCorp United)
Inc. and, in connection therewith, certain)
other related transactions.)

Case No. EM-2000-369

**Missouri Public
Service Commission**

MOTION FOR ISSUANCE OF PROTECTIVE ORDER


COME NOW UtiliCorp United Inc. ("UtiliCorp") and The Empire District Electric Company ("Empire"), by and through its counsel, and for their Motion For Issuance of Protective Order respectfully state as follows to the Missouri Public Service Commission ("Commission"):

1. UtiliCorp and Empire have received data requests from the Staff of the Commission in this case some of which seek information regarding fuel contracts, financial information which has not yet been disclosed to the public, the financial analysis of the proposed transaction, customer specific information, information concerning personnel matters including compensation details and other information which UtiliCorp and/or Empire consider to be confidential business information or information about which UtiliCorp and/or Empire have given assurances of confidentiality to others.

2. UtiliCorp and Empire therefore request that the Commission issue in this case what has become known generally as its "standard form" protective order which contains both Highly Confidential and Proprietary categories so that UtiliCorp and Empire may respond to these data requests in a confidential manner.

WHEREFORE, UtiliCorp and Empire move the Commission to issue a Protective Order in this case.

Respectfully submitted,



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Attorneys for UtiliCorp United Inc. and
The Empire District Electric Company

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 15TH day of DEC, 1999, to:

The Office of the Public Counsel
Truman Building, Room 250
P.O. Box 7800
Jefferson City, MO 65102-7800

