



Missouri Public Service Commission

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March 12, 2001

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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

FILED³

MAR 12 2001

Missouri Public
Service Commission

RE: Case No. EO-2001-472

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,

David A. Meyer
Assistant General Counsel
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(573) 751-9285 (Fax)
dmeyer@mail.state.mo.us

DM:ccl
Enclosure
cc: Counsel of Record

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

FILED³

MAR 12 2001

Missouri Public
Service Commission

In the Matter of an Investigation)
respecting the sale of UtiliCorp United)
Inc.'s Utility Network Construction,)
Operation and Maintenance Organization.)

Case No. EO-2001-472

MOTION FOR PROTECTIVE ORDER

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

1. The Staff has requested that the Commission enter an Order (1) establishing a case for an investigation into the announced plan of UtiliCorp United, Inc. (UtiliCorp) to sell its utility network construction, operation and maintenance organization, and (2) directing that the Staff file, within sixty days, a report of its investigation with recommendations for any action, including initiation of a complaint, that the Staff believes to be required by law or otherwise appropriate under the circumstances

2. The Staff intends to request information and materials from UtiliCorp by data requests as part of this proceeding, and based upon its prior experience, Staff believes the recipients of these data requests may claim that certain information and material should not be made public, 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; (2) employee-sensitive information; (3) marketing analyses or other market-specific information relating to

services offered in competition with others; (4) reports, work papers, or other documentation related to work produced by internal or external auditors or consultants; or (5) strategies employed, to be employed, or under consideration in contract negotiations.

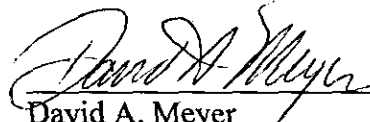
3. The information and material may become a part of the report filed with the Commission and would therefore become publicly available through that filing, as well as through subsequent proceedings in this case, without a protective order in place. Staff anticipates that UtiliCorp will allege that the public disclosure of this information and material will harm the its business interests.

4. Staff anticipates UtiliCorp will allege that the information subject to the proposed Protective Order will not be found in any publicly available document.

WHEREFORE, pursuant to 4 CSR 240-2.085, the undersigned respectfully request that the Commission issue its standard Protective Order in this proceeding which contains both Highly Confidential and Proprietary categories so that UtiliCorp may respond to data requests in a confidential manner if a particular response so qualifies.

Respectfully submitted,

DANA K. JOYCE
General Counsel



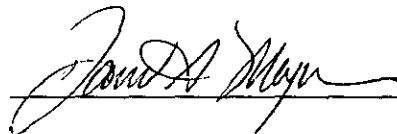
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Certificate of Service

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 March 12th, 2001.



**Service List for
Case No. EO-2001-472
March 12, 2001 (ccl)**

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