

September 10, 2001

**FILED<sup>3</sup>**

SEP 11 2001

**VIA FEDERAL EXPRESS**



Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
Governor Office Building  
200 Madison Street, Suite 100  
Jefferson City, MO 65101

Missouri Public  
Service Commission

Re: In the matter of the Application of Union Electric Company  
(d/b/a AmerenUE) for an Order Authorizing It to Withdraw  
from the Midwest ISO to Participate in the Alliance RTO  
Case No. EO-2001-684

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are an original and eight (8) copies of the Motion for Protective Order.

Please kindly acknowledge receipt of this filing by stamping as filed a copy of this letter and returning it to the undersigned in the enclosed, self-addressed, stamped envelope.

Sincerely,

A handwritten signature in cursive script, appearing to read "David B. Hennen".

David B. Hennen  
Associate General Counsel

DBH:rd  
Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

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In the Matter of the Application )  
Of Union electric Company (d/b/a )  
AmerenUE) for an Order Authorizing )  
It to Withdraw from the Midwest ISO )  
To Participate in the Alliance RTO )

Missouri Public  
Service Commission  
Case No. EO-2001-684

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Union Electric Company, d/b/a AmerenUE ("AmerenUE" or "Company"), and pursuant to 4 CSR 240-2.085 respectfully requests the Commission to issue a Protective Order in this proceeding. In support of this Motion, AmerenUE states the following:

1. AmerenUE expects that over the course of this proceeding, the Staff of the Commission and other parties to the case (including AmerenUE) will file and otherwise refer to information provided by AmerenUE, in written form through filings and orally at hearing, that are asserted to be "Proprietary" or "Highly Confidential" as defined in the Commission's standard protective order.

2. AmerenUE believes that certain information that may become part of the record in this case, although relevant to the proceedings, should not be treated as part of the open public record because it may be: (a) "Proprietary" in that the information may contain trade secrets, as well as confidential or private technical, financial, and business information; or (b) "Highly Confidential" in that it may concern information that is customer-specific; employee-sensitive; marketing analyses or other market-specific information relating to services offered in competition with others; reports, work papers or other documentation related to work produced by internal or external auditors or

consultants; or strategies employed, to be employed, or under consideration in contract negotiations.

3. Section 386.480 RSMo. 2000 provides that "[n]o information furnished to the commission by a corporation ... shall be open to public inspection or made public except on order of the commission, or by the commission or a commissioner in the course of a hearing or proceeding."

4. AmerenUE has provided certain information to the Staff of the Commission on the basis that it will be treated as "Proprietary" or "Highly Confidential" as those terms are used in the Commission's standard protective order. Moreover, AmerenUE asserts that the public disclosure of this information will harm AmerenUE's business interests.

5. AmerenUE in essence asserts 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 requests that the Commission issue its standard Protective Order in this proceeding which covers both Highly Confidential and Proprietary categories so that the Staff, AmerenUE, any other parties, and the Commission may treat information received from AmerenUE in a confidential manner if it requires confidential treatment.

Respectfully submitted,

UNION ELECTRIC COMPANY  
D/b/a AmerenUE

By: 

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Ameren Services Company  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on the following parties of record via U.S. First-Class Mail on this 10<sup>th</sup> day of September, 2001:

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

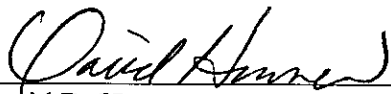
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