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November 22, 2000

Mr. Dale Hardy Roberts
Executive Secretary
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED³
NOV 22 2000 *nh*
Missouri Public
Service Commission

RE: Case No. ER-2001-299
The Empire District Electric Company

Dear Mr. Roberts:

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

If you have any questions, please give me a call.

Sincerely yours,

Gary W. Duffy
Gary W. Duffy

Enclosures
cc w/encl:

Office of Public Counsel
Office of General Counsel
Stuart W. Conrad

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

FILED³
NOV 22 2000
Missouri Public
Service Commission

In the Matter of The Empire District Electric)
Company's Tariff Sheets Designed to Implement)
a General Rate Increase for Retail Electric)
Service Provided to Customers in the Missouri)
Service Area of the Company.)

Case No. ER-2001-299

MOTION FOR ISSUANCE OF PROTECTIVE ORDER

Comes now The Empire District Electric Company ("Empire"), by and through its counsel, and for its motion for issuance of a protective order in this proceeding, respectfully states as follows:

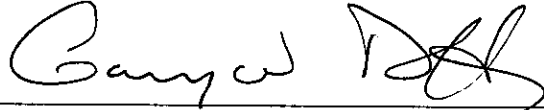
1. The Staff has already commenced discovery in this proceeding through the issuance of data requests to Empire. Those data requests are likely to require the production by Empire of information such as customer-specific information, accounting and financial information that is not available to the general public, and other material which would meet the definition of **HIGHLY CONFIDENTIAL** in the Commission's standard protective order.

2. The Commission has long recognized in rate cases that it is appropriate to issue protective orders to preserve the confidentiality of certain types of information in such proceedings. The public dissemination of such information could lead to adverse consequences for Empire, its customers, and members of the public.

3. Empire therefore requests 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 Empire may respond to these data requests in a confidential manner if a particular response so qualifies.

WHEREFORE, Empire moves that the Commission issue its standard form protective order in this case.

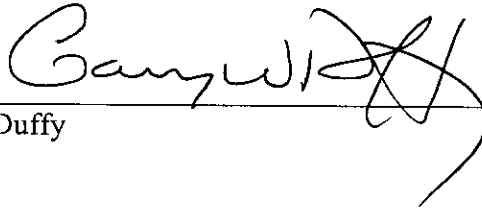
Respectfully submitted,



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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served this 22nd day of November, 2000, by either hand delivery or placement of same with the United States Postal Service in Jefferson City, Missouri, first class postage prepaid, to the counsel listed below.



Gary W. Duffy

Office of the Public Counsel
Governor State Office Building
Jefferson City, Missouri

Office of the General Counsel
Public Service Commission
Governor State Office Building
Jefferson City, Missouri

Stuart W. Conrad
Finnegan, Conrad & Peterson L.C.
1209 Penntower Office Center
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