LAW OFFICES

### BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION 312 EAST CAPITOL AVENUE DAVID V.G. BRYDON JAMES C. SWEARENGEN P. O. BOX 456 WILLIAM R. ENGLAND, III JEFFERSON CITY, MISSOURI 65 1 02-0456 TELEPHONE (573) 635-7166 JOHNNY K. RICHARDSON FACSIMILE (573) 635-3847 E-MAIL: DUFFY@BRYDONLAW.COM PAUL A. BOUDREAU SONDRA B. MORGAN

DEAN L. COOPER MARK G. ANDERSON TIMOTHY T. STEWART GREGORY C. MITCHELL RACHEL M. CRAIG BRIAN T. MCCARTNEY DALE T. SMITH

OF COUNSEL RICHARD T. CIOTTONE

June 12, 2000

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

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

JUN 1 2 2000

Missouri Public Service Commission

RE: Case No. GO-2000-624 Missouri Gas Energy

Dear Mr. Roberts:

GARY W. DUFFY

CHARLES E. SMARR

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

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

Sincerely yours,

/gwd **Enclosures** cc w/encl:

> Office of Public Counsel Office of the General Counsel

# BEFORE THE PUBLIC SERVICE COMMISSION/LED<sup>2</sup> OF THE STATE OF MISSOURI JUN 1 2 2000

In the matter of the application of Missouri Gas	)	Service Commission
Energy, a division of Southern Union Company,	)	Timission
for the issuance of an accounting authority order	)	Case No. GO-2000-624
relating to environmental activities.	)	

### **MOTION FOR PROTECTIVE ORDER**

COMES NOW Missouri Gas Energy ("MGE" or "Company"), a division of Southern Union Company ("Southern Union"), and pursuant to 4 CSR 240-2.085 moves for the issuance of a protective order in this proceeding. In support thereof, MGE respectfully states as follows:

- 1. MGE has received data requests from both the Staff of the Commission and the Office of the Public Counsel. In reviewing information in preparation to respond to these data requests, Southern Union has determined that some of the material to be provided in response can be classified as either highly confidential or proprietary.
- 2. The subject matter of this proceeding is environmental remediation and documents involved with this can involve reports of consultants and strategies involving contracts. Some documents may be involved in future litigation with other parties. Premature or improper disclosure of this material could adversely impact the interests of Southern Union. The material which Southern Union will claim protective status for will not be found in any format in any other public document.

WHEREFORE, MGE moves that the Commission issue its standard form protective order which contains both highly confidential and proprietary classifications.

Respectfully submitted,

Gary W. Duffy

MBE #24905

BRYDON, SWEARENGEN & ENGLAND, P.C.

P.O. Box 456

312 E. Capitol Avenue

Jefferson City, Missouri 65101

573/635-7166

FAX: 573/635-3847

E-mail: <u>Duffy@Brydonlaw.com</u>

# Attorneys for Missouri Gas Energy

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing was served via hand delivery this 12th day of June, 2000, upon:

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

Jefferson City, Missouri

Gary W Duffy

MGEmgpaaopoapp/gdmydocs/wp8