

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

Staff of the Public Service Commission     )  
of the State of Missouri,                     )  
  Complainant,                     )

v.   )

Case No. TC-2006-0184

New Florence Telephone Company,         )  
  Respondent.                     )

**MOTION FOR ISSUANCE OF A PROTECTIVE ORDER**

Comes now New Florence Telephone Company ("New Florence" or "Applicant") and moves the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, Applicant respectfully states to the Commission as follows:

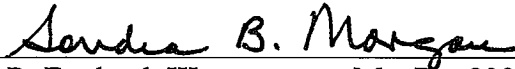
1. On October 24, 2005, the Staff of the Commission filed a Complaint against New Florence alleging various violations of statutes and Commission rules and requesting authority to seek penalties based on these alleged violations.
2. Staff has now sent data requests to New Florence the responses to which contain confidential and proprietary information. Applicant requests that the Commission issue a Protective Order so that these documents may be treated as "proprietary." Applicant anticipates that additional confidential or proprietary information may be requested by the Commission Staff or used in testimony or at the hearing to be held in this proceeding.
3. None of the information for which a claim of confidentiality is made can be found in any format in any other public document.

4. Therefore, because of the potential for public disclosure of such information without a protective order in place, Joint Applicants move the Commission to issue its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, Joint Applicants respectfully request that the Commission:

- (a) issue the Commission's standard-form protective order containing classifications of "highly confidential" and "proprietary" to guide the parties' conduct in this case; and,
- (b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,



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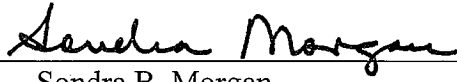
Attorneys for New Florence Telephone Company

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by electronic submission or hand-delivered this 15<sup>th</sup> day of February, 2006 to:

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Jefferson City, Missouri 65102

Mr. Kevin Thompson, General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

  
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