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September 4, 2003

Secretary  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**FILED<sup>2</sup>**  
SEP 04 2003  
Missouri Public  
Service Commission

**RE: Missouri-American Water Company and  
Warren County Water & Sewer Company**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of the Joint Applications and Motion for Expedited Treatment and Motion for Protective Order filed on behalf of Missouri-American Water Company. Please stamp the enclosed extra copy of each "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

Dean L. Cooper

DLC/llv  
Enclosures  
cc: Parties of Record

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

**FILED<sup>2</sup>**  
SEP 04 2003

In the Matter of the Joint Application of )  
Missouri-American Water Company and Warren )  
County Water & Sewer Company for Authority )  
for Missouri-American Water Company to )  
Acquire Certain Assets of Warren County Water )  
& Sewer Company and, in Connection Therewith, )  
Certain Other Related Transactions. )

Case No. \_\_\_\_\_

Missouri Public  
Service Commission

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Missouri-American Water Company (“MAWC” or the “Company”), in accordance with 4 CSR 240-2.085, and, for its motion for issuance of the Missouri Public Service Commission’s (“Commission”) standard-form protective order, states as follows:

1. The Company has filed with the Commission an application to acquire certain assets of the Warren County Water & Sewer Company.

2. The Company is seeking to provide with its application, may seek to provide in testimony, and anticipates being asked through data requests, to provide competitive pricing information and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be requested or utilized in testimony by other parties may contain customer-specific information, competitive pricing information, trade secrets and confidential, technical, financial and business information, or other material of a confidential or proprietary nature. Public disclosure of the referenced material may tend to harm the interests of the Company, its employees and its customers. None of the information for which a claim or confidentiality will be made can be found in any format in a public document.

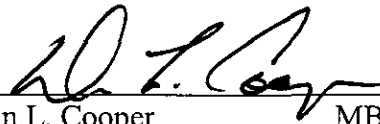
3. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of “highly

confidential” and “proprietary.”

WHEREFORE, the Company, pursuant to 4 CSR 240-2.085, respectfully requests 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,



Dean L. Cooper MBE#36592  
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ATTORNEYS FOR  
MISSOURI-AMERICAN WATER COMPANY

## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered, or sent by U.S. Mail, postage prepaid, on September 4<sup>th</sup>, 2003, to the following:

Mr. Keith Krueger  
Office of the General Counsel  
Governor Office Building, 8<sup>th</sup> Floor  
Jefferson City, Mo 65101

Ms. Ruth O'Neill  
Office of the Public Counsel  
Governor Office Building, 6<sup>th</sup> Floor  
Jefferson City, MO 65101

Mr. Paul S. DeFord  
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