

FILED

BEFORE THE PUBLIC SERVICE COMMISSION JAN 05 2004  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of the Joint Application of )  
Missouri-American Water Company and Cedar )  
Hill Utility Company, Inc. for Authority )  
for Missouri-American Water Company to )  
Acquire Certain Assets of Cedar Hill Utility )  
Company, Inc., and, in Connection Therewith, )  
Certain Other Related Transactions. )

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

**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 Cedar Hill Utility Company, Inc.

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.

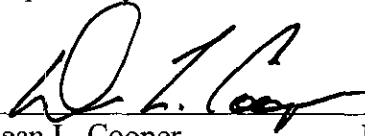
3. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of “highly

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  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 E. Capitol Avenue  
P. O. Box 456  
Jefferson City, MO 65102  
(573) 635-7166  
(573) 635-3847 facsimile  
[dcooper@brydonlaw.com](mailto:dcooper@brydonlaw.com)

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 January 5<sup>th</sup>, 2004, to the following:

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

Office of the Public Counsel (Ruth O’Neill)  
Governor Office Building, 6<sup>th</sup> Floor  
Jefferson City, MO 65101

Ms. Karen M. Jordan  
Sonnenschein Nath & Rosenthal LLP  
One Metropolitan Square, Suite 3000  
St. Louis, MO 63102

