

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

In the Matter of Missouri Gas Energy's)	
Tariffs to Implement a General Rate)	Case No. GR-2004-0209
Increase for Natural Gas Service)	

MOTION FOR PROTECTIVE ORDER

COMES NOW Missouri Gas Energy, a division of Southern Union Company ("MGE" or "Company"), by counsel, 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. MGE has filed with the Commission tariffs designed to increase its rates for natural gas service which filing has been docketed as Case No. GR-2004-0209.
2. MGE 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. Additionally, data requests may ask for information that is not considered public under the rules of the Federal Securities and Exchange Commission. Public disclosure of the referenced material which the Commission Staff, Office of the Public Counsel and/or Intervenors may seek in discovery may tend to harm the interests of the Company, its employees and its

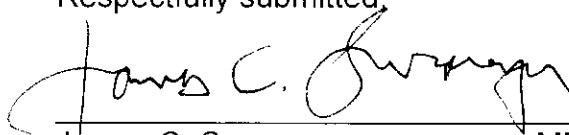
customers. None of the information for which a claim or confidentiality will be made can be found in any format in a public document.

3. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, MGE desires that the Commission issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary." The Commission has customarily issued protective orders in general rate cases.

WHEREFORE, MGE, 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,

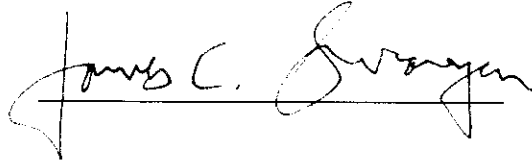


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ATTORNEYS FOR MISSOURI GAS ENERGY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered or mailed by U.S. mail on this 8TH day of December, 2003, to all parties of record.

A handwritten signature in cursive script, reading "James C. Swanson", is written over a horizontal line. The signature is written in black ink.