

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED
NOV 30 1995
MISSOURI
PUBLIC SERVICE COMMISSION

In the matter of the Application of Union Electric)
Company for an order authorizing: (1) certain)
merger transactions involving Union Electric)
Company; (2) the transfer of certain Assets, Real) Case No. EM-96-149
Estate, Leased Property, Easements and Contractual)
Agreements to Central Illinois Public Service)
Company; and (3) in connection therewith, certain)
other related transactions.)

MOTION FOR PROTECTIVE ORDER

COMES NOW Union Electric Company ("UE"), a Missouri corporation, and hereby requests that the Commission issue a standard Protective Order for "highly confidential" and "proprietary" information as defined by the Commission. In support of its motion, UE states as follows:

1. UE filed its Application regarding certain merger transactions with the Commission on November 7, 1995.
2. The Application was docketed as Case No. EM-96-149.
3. UE anticipates that during discovery or at a future hearing and/or an agenda meeting at which the Application is noticed to be considered by the Commission, the Commission may request information or inquire into matters that UE would contend includes items covered by the definition of "highly confidential" or "proprietary" found in the Commission's standard Protective Order and, therefore, UE would contend such items should not be disclosed to the public.
4. UE is submitting this Motion to the Commission to raise this matter for the Commission's consideration in advance of discovery, hearings or any agenda meeting at which the Application is noticed to be considered by the Commission.

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X

5. Staff and the Office of Public Counsel have indicated that they have no objection to the issuance of a standard Protective Order by the Commission for "highly confidential" and "proprietary" information in this proceeding.

WHEREFORE, UE requests that the Commission issue an Order establishing a standard Protective Order in this docket for "highly confidential" and "proprietary" information.

Respectfully submitted,

UNION ELECTRIC COMPANY



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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed to all parties on the service list on this 29th day of November, 1995.



Steven R. Sullivan

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November 17, 1995

FILED

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MISSOURI
PUBLIC SERVICE COMMISSION

Mr. David L. Rauch
Executive Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Mo 65102

Re: Case No. EM-96-149

Dear Mr. Rauch:

Enclosed for filing on behalf of Trigen-St. Louis Energy Corporation please find the original and fourteen copies of an Application to Intervene in the above-captioned cause. Please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you for your consideration in this matter.

Sincerely,



Richard W. French

RWF:bt

Enclosures

cc: Mr. Charles J. Fishman
Mr. Steve Sullivan
Office of the Public Counsel

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MO. PUBLIC SERVICE COMMISSION