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November 2, 1999

FILED²

NOV 2 1999

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Missouri American Water Company - Case Nos. WR-2000-281 and ^SWR-2000-282

Dear Mr. Roberts:

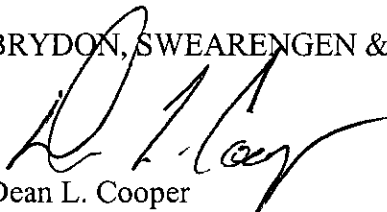
Enclosed for filing in the above-referenced proceeding please find an original and fourteen copies of a Motion for Issuance of a Protective Order. Please stamp the enclosed extra copy "filed" and return same to me.

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/rhg

Enclosures

cc: Office of the Public Counsel
Keith Krueger, PSC
Shannon Cook, OPC

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED²

NOV 2 1999

Missouri Public
Service Commission

In the Matter of Missouri-American)
Water Company's Tariff Sheets Designed)
to Implement General Rate Increases for)
Water and Sewer Service provided to)
Customers in the Missouri Service Area)
of the Company.)

Case No. WR-2000-281

Case No. ~~WR~~^S-2000-282

MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

Comes now Missouri-American Water Company ("MAWC"), and, in support of its motion for issuance of the Missouri Public Service Commission's ("Commission") standard-form protective order, states as follows:

1. MAWC has filed with the Commission tariffs designed to increase its rates for water and sewer service.
2. Information which may be requested during the Staff's investigation, discovery initiated by the Office of the Public Counsel ("Public Counsel") and discovery initiated 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 material which the Staff, Public Counsel, or others may seek in discovery may tend to harm the interests of MAWC and its customers.
3. In addition, MAWC anticipates that some of the testimony and exhibits filed by itself and other parties to this proceeding may make reference to information of a confidential or proprietary nature.
4. Therefore, because of the potential for public disclosure of such information without a protective order in place, MAWC moves the Commission to issue in this case its standard-form protective order containing classifications of "highly confidential" and

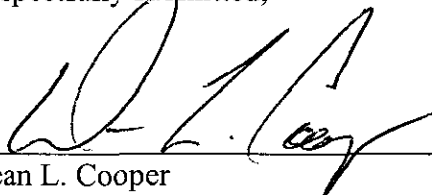
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"proprietary."

WHEREFORE, MAWC 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-AMERICAN
WATER COMPANY

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 2nd day of November, 1999, to the following:

Mr. Keith Krueger
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Ms. Shannon Cook
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

