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October 19, 1999

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

**FILED<sup>2</sup>**

OCT 19 1999

Missouri Public  
Service Commission

**Re: Case Number EM-2000-292**

Dear Mr. Roberts:

Enclosed for filing in the referenced case on behalf of UtiliCorp United Inc. and St. Joseph Light & Power Company, please find an original and fourteen copies of a Motion for Issuance of Protective Order and an original and fourteen copies of a Motion to Establish Procedural Schedule.

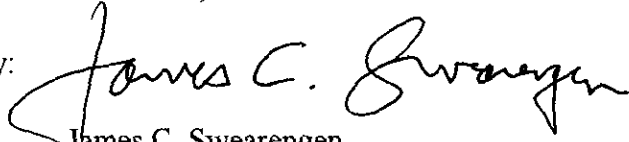
Would you please see that these filings are brought to the attention of the appropriate Commission personnel.

I thank you in advance for your cooperation in this matter.

Sincerely yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

  
James C. Swearingen

JCS/lar

Enclosure

cc: Office of the Public Counsel

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>  
OCT 19 1999

Missouri Public  
Service Commission

In the matter of the Joint Application of )  
UtiliCorp United Inc. and St. Joseph Light )  
& Power Company for authority to merge )  
St. Joseph Light & Power Company with )  
and into UtiliCorp United Inc. and, in )  
connection therewith, certain other related )  
transactions. )

Case No. EM-2000-292

**MOTION FOR ISSUANCE OF PROTECTIVE ORDER**

COME NOW UtiliCorp United Inc. ("UtiliCorp") and St. Joseph Light & Power Company ("SJLP"), by and through its counsel, and for their Motion For Issuance of Protective Order respectfully state as follows to the Missouri Public Service Commission ("Commission"):

1. UtiliCorp and SJLP have received data requests from the Staff of the Commission in this case some of which seek information regarding fuel contracts, financial information which has not yet been disclosed to the public, the financial analysis of the proposed transaction, customer specific information, information concerning personnel matters including compensation details and other information which UtiliCorp and/or SJLP consider to be confidential business information or information about which UtiliCorp and/or SJLP have given assurances of confidentiality to others.

2. UtiliCorp and SJLP therefore request that the Commission issue in this case what has become known generally as its "standard form" protective order which contains both Highly Confidential and Proprietary categories so that UtiliCorp and SJLP may respond to these data requests in a confidential manner.

WHEREFORE, UtiliCorp and SJLP move the Commission to issue a Protective Order in this case.

Respectfully submitted,



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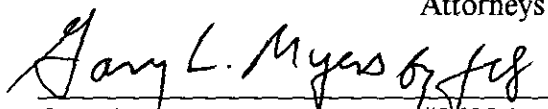
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Attorneys for UtiliCorp United Inc.



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and Secretary

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Attorneys for St. Joseph Light & Power 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 19TH day of OCTOBER 1999, to:

The Office of the Public Counsel

Truman Building, Room 250

P.O. Box 7800

Jefferson City, MO 65102-7800

