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August 21, 2002

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FILED²

AUG 21 2002

**Missouri Public
Service Commission**

Secretary of the Commission
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102-0360

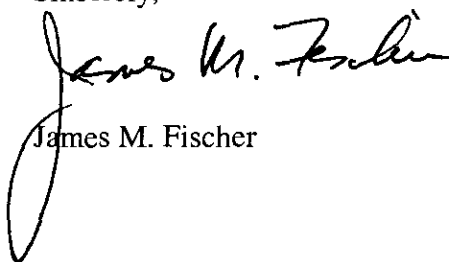
RE: *In the matter of United Cities Gas Company's Purchased Gas Adjustment
Factors to be Reviewed in Its 1999-2000 Actual Cost Adjustment;
Case No. GR-2000-392, Tariff Nos. 200100519 and 200100520*

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter are the original and eight (8) copies of the Motion for Protective Order of United Cities Gas. A copy of the foregoing Motion has been hand-delivered or mailed this date to each party of record.

Thank you for your attention to this matter.

Sincerely,


James M. Fischer

/jr
Enclosures

cc: Office of the Public Counsel
Dan Joyce
Dennis L. Frey

FILED²

AUG 21 2002

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

| | | |
|---|---|----------------------|
| In the matter of United Cities Gas Company's |) | |
| Purchased Gas Adjustment Factors to be Reviewed |) | Case No. GR-2000-392 |
| in Its 1999-2000 Actual Cost Adjustment. |) | Tariff No. 200100519 |
| | | Tariff No. 200100520 |

MOTION FOR PROTECTIVE ORDER

COMES NOW United Cities Gas Company (UCG or Company) and respectfully requests that the Missouri Public Service Commission (Commission) issue a Protective Order in this proceeding. In support of this Motion, UCG states as follows:

1. This case involves United Cities Gas Company's Purchased Gas Adjustment factors to be reviewed in its 1999-2000 Actual Cost Adjustment.

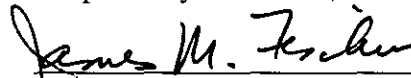
2. Based upon its prior experience and assertions by counsel for parties in other similar cases resulting in the issuance of a Protective Order, UCG believes that certain information requested by the Commission Staff should not be made public because it is either: (a) "proprietary" in that the information contains trade secrets, as well as confidential or private technical, financial, and business information; or (b) "highly confidential" in that it concerns (1) material or documents that contain information relating directly to specific customers; or (2) market-specific information relating to services offered in competition with other parties or non-parties. Among other things, this information may contain: customer specific information, competitive pricing information, trade secrets, confidential technical financial and business information or other material of a confidential proprietary nature.

3. The information may become a part of the report filed with the Commission and would therefore become publicly available through that filing, as well as through subsequent proceedings in this case, without a protective order in place. The public disclosure of this information will harm the Company's business interests, and that the information subject to the proposed Protective Order will not be found in any publicly available document.

4. Counsel for the Commission Staff has no objection to this request for a standard Protective Order.

WHEREFORE, pursuant to 4 CSR 240-2.085, United Cities Gas Company respectfully requests that the Commission issue in this proceeding its standard Protective Order, containing both of the Highly Confidential and Proprietary categories.

Respectfully submitted,



James M. Fischer MBN 27543

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Attorneys for United Cities Gas Company

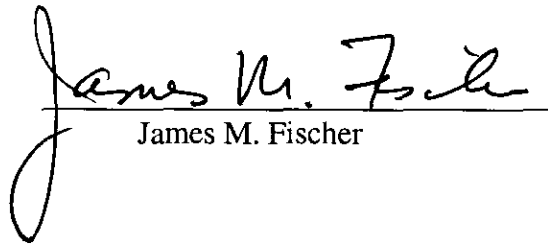
CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, First Class, postage prepaid, this 21st day of August 2002, to:

Office of the Public Counsel
P.O. Box 7800
Jefferson City MO 65102

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