## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the matter of the Application of	)	
The Oregon Farmers Mutual Telephone	)	
Company for Authority to Execute	)	Case No. TF-2005-0503
a Secured Guaranty in favor of the	· )	
Rural Telephone Finance Cooperative	)	
in connection with a loan to Northwest	)	
Missouri Holdings, Inc.	)	

## MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

Comes now The Oregon Farmers Mutual Telephone Company ("Oregon Farmers" or "Applicant") and moves the Missouri Public Service Commission ("Commission") to issue its standard-form protective order in the above-referenced case. In support thereof, Applicant respectfully states to the Commission as follows:

- 1. On June 24, 2005, Applicant filed an Application with the Commission requesting authority to execute a Secured Guaranty in favor of the Rural Telephone Finance Cooperative ("RTFC").
- 2. In response to data requests from the Staff of the Commission, Oregon Farmers has provided financial information that it considers proprietary and/or highly confidential. Staff proposes to attach some of that information to its Recommendation to be filed in this case as well as to refer to highly confidential information from Case No. IM–2004-0461.
- 3. Applicant requests that the Commission issue a Protective Order so that this information may be designated as "proprietary" or "highly confidential" in the Recommendation that will be publicly filed. The information contains confidential information regarding the borrower, Northwest Missouri Holdings, Inc., as well as information regarding

Oregon Farmers. Because public disclosure of this information could cause harm to Applicant, Oregon Farmers requests that the Commission issue a Protective Order. None of the information for which a claim of confidentiality is made can be found in any format in any other public document.

4. Therefore, because of the potential for public disclosure of such information without a protective order in place and the potential harm to Applicant if this information is made public, Applicant moves the Commission to issue its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, Applicant 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,

Sondra B. Morgan

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was sent by electronic transmission, hand-delivered or mailed, United States Mail, postage prepaid, this 30th day of August, 2005, to:

Lewis Mills Public Counsel Office of Public Counsel P. O. Box 7800 Jefferson City, MO 65102 Marc Poston Senior Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Sondra B. Morgan