

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the matter of the Application of Union )  
Electric Company (d/b/a AmerenUE) for )  
an order authorizing the sale, transfer )  
and assignment of certain Assets, Real )  
Estate, Leased Property, Easements and )  
Contractual Agreements to Central Illinois )  
Public Service Company (d/b/a AmerenCIPS) )  
and, in connection therewith, certain other )  
related transactions. )

Case No. EO-2004-0108

**MOTION FOR PROTECTIVE ORDER**

**COMES NOW** Union Electric Company d/b/a AmerenUE (“AmerenUE” or the “Company”), in accordance with 4 CSR 240-2.085, and, for its Motion for issuance of the Missouri Public Service Commission’s (“Commission”) standard-form protective order, states as follows:

1. The Company has previously filed with the Commission an Application in support of its transfer of the Company’s service territory in Illinois to Central Illinois Public Service Company d/b/a AmerenCIPS. Simultaneous with the filing of this Motion for Protective Order, the Company is filing its direct testimony.

2. The Company, in the filed testimony of Mr. Richard Voytas, provides certain information as to production costs and reserve margins associated with its generating plants. This information is “Highly Confidential” as defined in the Commission’s standard-form protective order in that it includes marketing analyses and other market specific information relating to services offered in competition with others. Additionally, it is anticipated that other information which may be requested or utilized in testimony by other parties may contain competitive pricing information, trade secrets and confidential, technical, financial and business information, or other material of a highly confidential or proprietary nature. Additionally,

requests may ask for information that is not considered public under the rules of the Securities and Exchange Commission. Public disclosure of the referenced material which the Commission Staff, Office of Public Counsel, or others may seek in discovery may tend to harm the interests of the Company, its shareholders and its customers. None of the information for which a claim of confidentiality will be made can be found in any format in a public document.

3. Therefore, because there is a potential for public disclosure of highly confidential or proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of “highly confidential” and “proprietary.” The Commission has historically issued protective orders in general rate cases and other cases similar to the present one.

**WHEREFORE**, the Company, pursuant to 4 CSR 240-2.085, 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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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via electronic mail on this 17<sup>th</sup> day of September, 2003, on the following parties of record:

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