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November 29, 2001

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

FILED²

NOV 29 2001

Missouri Public
Service Commission

RE: Case No. EC2002-112

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S MOTION FOR PROTECTIVE ORDER**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Victoria L. Kizito
Associate General Counsel
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Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

NOV 29 2001

Missouri Public
Service Commission

Sterling Moody, Sterling's Market Place,)
and Sterling's Place, I)

Complainants,)

vs.)

Case No. EC-2002-112

AmerenUE, Union Electric Co. d/b/a)
AmerenUE; and Mike Foy, Leroy Ettling,)
and Sherry Moshner, as employees of)
AmerenUE.)

STAFF'S MOTION FOR PROTECTIVE ORDER

COMES NOW Staff of the Missouri Public Service Commission (Staff) and respectfully requests the Commission to issue a Protective Order in this proceeding and accept the filing of the Staff's Report, filed contemporaneously in this case, under the standard Protective Order. In support of this Motion, the Staff states:

1. On September 13, 2001, the Missouri Public Service Commission (Commission) issued an Order Directing Filing Staff Investigation And Report, directing Staff to investigate the contested issues in this case and to file a report of its findings with the Commission by November 29, 2001.

2. Pursuant to 4 CSR 240-2.070(10), an investigative report by the Staff shall not be made public unless released in accordance with sections 386.480, 392.210(2) or 393.140(3), RSMo., or during the course of the hearing involving the complaint.

3. In order to carry out the intent and goals of the Commission's Order Directing Filing Staff Investigation and Report, effective October 29, 2001, the Staff, Union Electric Company d/b/a/ AmerenUE (Company) and Complainants were required to exchange certain information for the Staff to complete its Report.

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4. Staff believes that Complainants may claim that this certain information should not be made public, although it is relevant to the proceeding because, in paragraph 30 of the complaint, Complainants allege that the Company openly and publicly discussed issues regarding the Complaint and thereby caused detriment and damage to the Complainants. These same issues are discussed in Staff's Report.

5. Staff believes that the Company may claim that this certain information should not be made public, although it is relevant to the proceeding, because it is "highly confidential" in that it concerns material or documents that contain information relating directly to specific customers.

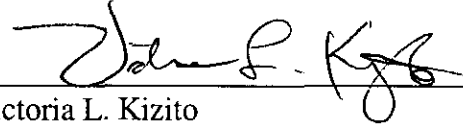
6. The information included in Staff's Report filed with the Commission would become publicly available through the filing, as well as through subsequent proceedings in this case, without a protective order in place. Staff anticipates that the Company may allege that the public disclosure of this information will harm the company's business interests. Staff also anticipates that the Complainants may allege that the public disclosure of this information will harm Complainants as specified in the Complaint.

7. Staff anticipates that Complainants and the Company may allege that that the information subject to the proposed Protective Order will not be found in any publicly available document.

WHEREFORE, pursuant to 4 CSR 240-2.085, Staff respectfully requests that the Commission issue its standard Protective Order regarding highly confidential information in this proceeding and accept the Staff's Report under the Protective Order, and for any other relief which the Commission deems just and proper.

Respectfully submitted,

DANA K. JOYCE
General Counsel

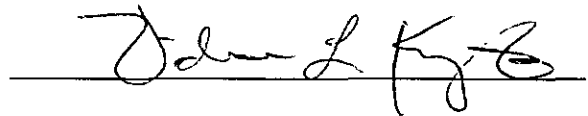


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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 29th day of November 2001.



Service List for
Case No. EC-2002-112
Verified: November 29, 2001, (cgo)

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