

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

Staff of the Missouri Public Service Commission,)	
)	
)	
Complainant,)	
)	
v.)	Case No. GC-2006-_____
)	
Missouri Pipeline Company, LLC and Missouri Gas Company)	
Respondents.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW the Staff of the Missouri Public Service Commission and pursuant to 4 CSR 240-2.085 moves the Missouri Public Service Commission to issue its standard Protective Order in this case on the following grounds:

1. This case involves Staff's Complaint consisting of six counts alleging various tariff violations by Respondents.
2. Much of the information provided to Staff in the preliminary audit of these companies is stamped "Highly Confidential."
3. Staff anticipates that responses to additional data requests may likely include competitive pricing information, technical, financial or business information of a confidential or proprietary nature.
4. Disclosure by Staff of confidential information furnished by jurisdictional Companies is prohibited by §386.480 RSMo (2000).
5. Issuance of a protective order is expected to help to minimize discovery disputes, and has provided a sound method for submitting confidential information to the Commission.

WHEREFORE, Staff respectfully requests the Commission to issue its standard Protective Order in this docket.

Respectfully submitted,

/s/ Lera L. Shemwell

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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 this 21st day of June, 2006.

/s/ Lera L. Shemwell