

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

In the Matter of a Management Audit of	)	
Aquila, Inc., d/b/a Aquila Networks-MPS	)	Case No. EO-2006-0356
And Aquila Networks-L&P	)	

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Aquila, Inc. ("Aquila" or the "Company"), by and through counsel, pursuant to Commission Rule 4 CSR 240-2.085 and requests the Missouri Public Service Commission ("Commission") to issue its customary Protective Order to govern the exchange of information between parties to the captioned proceeding. In support thereof, Aquila states as follows:

1. On June 13, 2006, the Commission issued its Order Requiring a Management Audit of Aquila, Inc. and Specifying the Issues to be Addressed. By virtue of said Order, the Commission directed its Staff to proceed with an investigation of Aquila with regard to ten (10) enumerated topics.

2. Staff has commenced its investigation in this matter and has submitted to Aquila a number of data requests. Aquila expects that its answers to these and other data requests propounded by Staff are likely to include information or documentation considered by Aquila to be commercially sensitive or proprietary. It is anticipated the Staff may use this information in making its report to the Commission concerning its investigation of Aquila. Public disclosure of this information may tend to harm the interests of the Company.

3. None of the information for which a claim of confidentiality will be made can be found in any format in a public document.

4. In order to facilitate the prompt exchange of information between Staff and Aquila, the Company requests the Commission issue in this case its standard form of Protective Order containing classifications for "highly confidential" and "proprietary" information.

WHEREFORE, Aquila respectfully requests the Commission issue its customary Protective Order and for such other orders and relief as is appropriate in the circumstances.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was delivered by first class mail, electronic mail or hand delivery, on the 11th day of July, 2006, to the following:

General Counsel  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102-0360

Office of the Public Counsel  
Governor Office Building  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102-2230

/s/ Paul A. Boudreau