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December 5, 2000

Mr. Dale Hardy Roberts
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Missouri Public Service - Case No. GR-2000-520

Dear Mr. Roberts:

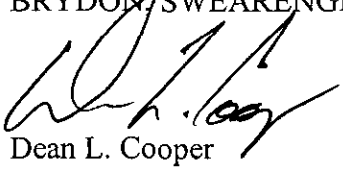
Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Motion for Issuance of a Protective Order. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:


Dean L. Cooper

DLC/rhg
Enclosures

cc: Office of the Public Counsel
Ms. Lera Shemwell, PSC
Mr. Doug Micheel, OPC

FILED²
DEC 5 2000
Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
DEC 5 2000
Missouri Public
Service Commission

In the Matter of Missouri Public Service's)
Purchased Gas Adjustment factors to be reviewed) Case No. GR-2000-520
in its 1999-2000 Actual Cost Adjustment.)

MOTION FOR ISSUANCE OF A PROTECTIVE ORDER

Comes now UtiliCorp United Inc. ("UtiliCorp" or "Company") d/b/a Missouri Public Service, and, in support of its motion for issuance of the Missouri Public Service Commission's ("Commission") standard-form protective order, states as follows:

1. The Commission Staff ("Staff") has directed data requests to UtiliCorp which carry the above case number. Information which has been requested by the Staff will contain -- and, additionally, information which may be requested during the Office of the Public Counsel's ("Public Counsel") investigation, through additional discovery initiated by the Staff and through discovery initiated by other parties, may contain -- customer-specific information, competitive pricing information, trade secrets and confidential, technical, financial and business information, or other material of a confidential or proprietary nature. Public disclosure of the material which the Public Counsel, Staff, or others may seek in discovery may tend to harm the interests of UtiliCorp, its employees and its customers.

3. In addition, UtiliCorp anticipates that if testimony is required by the Office of the Public Counsel, some of the testimony and exhibits filed by itself and other parties to this proceeding may make reference to, or include, information of a confidential or proprietary nature.

4. Therefore, because Commission Rule 4 CSR 240-2.090 would require UtiliCorp to respond to the Staff's data requests within twenty (20) days and there is a potential for public disclosure of confidential or proprietary information without a protective order in place, UtiliCorp

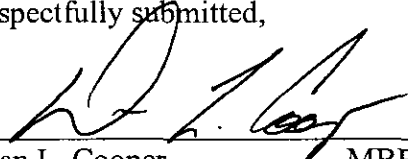
moves the Commission to issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary."

5. Counsel for UtiliCorp has discussed this motion with counsel for Staff and counsel for the Public Counsel. Neither the Staff nor the Public Counsel have an objection to the issuance of the requested protective order.

WHEREFORE, UtiliCorp 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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ATTORNEYS FOR UTILICORP UNITED INC.
D/B/A MISSOURI PUBLIC SERVICE

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was either hand-delivered or mailed, U.S. Mail, postage prepaid, on the 30th day of December, 2000, to: Lera Shemwell, Missouri Public Service Commission, Governor Office Building, Jefferson City, Mo 65101; and, Douglas Micheel, Office of the Public Counsel, 6th Floor, Governor Office Building, Jefferson City, Mo 65101.

