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December 24, 2002

Secretary Public Service Commission P. O. Box 360 Jefferson City, MO 65102 FILED

DEC 2 4 2002

RE: Case No. GR-2002-392

Missouri Public Service Commission

Dear Mr. Roberts:

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A. BOUDREAU

SONDRA B. MORGAN CHARLES E. SMARR

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

Enclosed please find an original and eight copies of the Motion For Protective Order filed on behalf of Aquila, Inc. Please file stamp the enclosed extra receipt copy and return to me for my records.

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/tli Enclosures

CC:

Robert Franson

Doug Micheel

FILED⁴
DEC 2 4 2002
Missouri

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

		-givice Comm	ıbı:-
In the Matter of Aquila Networks - MPS's)	-01 NA	rission
Purchased Gas Adjustment Factors to be)	Case No. GR-2002-392	917
Reviewed in its 2001-2002 Actual Cost Adjustment.)		

MOTION FOR PROTECTIVE ORDER

COMES NOW Aquila, Inc. d/b/a Aquila Networks - MPS ("MPS" or "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 may seek to provide in testimony, and has been asked through Commission Staff ("Staff") data requests, to provide competitive pricing information and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be requested or utilized in testimony by the Staff, as well as the Office of the Public Counsel ("OPC"), 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 referenced material which the Staff, OPC, or others may seek in discovery may tend to harm the interests of the Company, its employees and its customers. None of the information for which a claim or confidentiality will be made can be found in any format in a public document.
- 2. Therefore, because there is a potential for public disclosure of 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."

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,

Dean L. Cooper

MBE#36592

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ATTORNEYS FOR AQUILA, INC. D/B/A AQUILA NETWORKS - MPS

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered on December 2/, 2002 to the following:

Robert Franson
Office of the General Counsel
Governor Office Building
Jefferson City, MO 65101

Douglas Micheel
Office of the Public Counsel
Governor Office Building
Jefferson Qity, MO 65101