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December 24, 2002

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

**FILED<sup>4</sup>**

**DEC 24 2002**

**RE: Case No. GR-2002-468**

Missouri Public  
Service Commission

Dear Mr. Roberts:

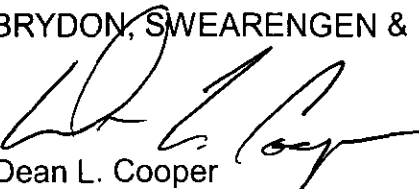
Enclosed please find an original and eight copies of the Motion For Protective Order filed on behalf of Aquila, Inc. Please file stamp the enclosed extra receipt copy and return to me for my records.

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

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

In the Matter of Aquila Networks - L&P's	)	
Purchased Gas Adjustment Factors to be	)	Case No. GR-2002-468
Reviewed in its Actual Cost Adjustment for 2001-2002	)	

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Aquila, Inc. d/b/a Aquila Networks - L&P ("L&P" 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.

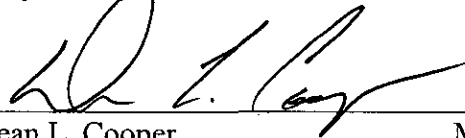
2. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary."

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 - L&P

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered on December 24, 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 City, MO 65101

