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## Missouri Public Service Commission

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 Secretary/Chief Regulatory Law Judge  
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August 3, 2001

FILED

AUG 3 2001

Mr. Dale Hardy Roberts  
 Secretary/Chief Regulatory Law Judge  
 Missouri Public Service Commission  
 P. O. Box 360  
 Jefferson City, MO 65102

Missouri Public  
 Service Commission

*Lead case*  
**RE: Case No. GR-2001-388 -- In the Matter of Southern Missouri Gas Company, L.P.'S  
 Purchased Gas Adjustment Factors to be Reviewed in its 2000-2001 Actual Cost  
 Adjustment.**

**Case No. GR-2001-39 – In the Matter of Southern Missouri Gas Company, L.P.'S  
 Purchased Gas Adjustment Factors to be Reviewed in its 1999-2000 Actual Cost  
 Adjustment.**

Dear Mr. Roberts:

Enclosed for filing in the above-captioned consolidated cases are an original and eight (8) conformed copies of a **MOTION FOR PROTECTIVE ORDER**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

*Robert V. Franson*

Robert V. Franson  
 Associate General Counsel  
 (573) 751-6651  
 (573) 751-9285 (Fax)

Enclosure  
 cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

AUG 3 2001

Missouri Public  
Service Commission

In the matter of Southern Missouri Gas )  
Company, L.P.'s Purchased Gas Adjustment )  
factors to be reviewed in its 2000-2001 )  
Actual Cost Adjustment )

Case No. GR-2001-388

In the Matter of Southern Missouri Gas )  
Company, L.P.'s Purchased Gas Adjustment )  
Factors to be reviewed in its 1999-2000 )  
Actual Cost Adjustment )

Case No. GR-2001-39

**MOTION FOR PROTECTIVE ORDER**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff") and respectfully requests the Commission to issue a Protective Order in this proceeding. In support of this Motion, the Staff states as follows:

1. This consolidated case involves the review of Southern Missouri Gas Company, L.P.'s Purchased Gas Adjustment factors to be reviewed in its 1999-2000 Actual Cost Adjustment and in its 2000-2001 Actual Cost Adjustment. As part of its discovery in this case Staff has already served two sets of Data Requests on Southern Missouri Gas Company, L.P. ("Company").

2. Based upon its prior experience and assertions by counsel for parties in other similar cases resulting in the issuance of a Protective Order, the Staff believes the Company may claim that certain information should not be made public, although it is relevant to the proceeding, because it is either:

- (a) "proprietary" in that the information contains trade secrets, as well as confidential or private technical, financial, and business information; or

(b) “highly confidential” in that it concerns:

- (1) material or documents that contain information relating directly to specific customers; or
- (2) market-specific information relating to services offered in competition with other parties or non parties. Among other things, this information may contain: customer specific information, competitive pricing information, trade secrets, confidential technical financial and business information or other material of a confidential proprietary nature.

3. The information may become a part of the report filed with the Commission and would therefore become publicly available through that filing, as well as through subsequent proceedings in this case, without a protective order in place. Staff anticipates that the Company will allege that the public disclosure of this information will harm the Company’s business interests.

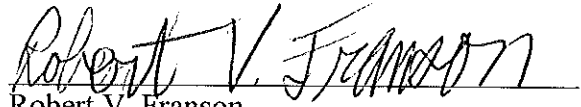
4. Staff anticipates that the Company will allege that the information subject to the proposed Protective Order will not be found in any publicly available document.

5. Counsel for the Company and Office of the Public Counsel have no objection to this request for a standard Protective Order.

WHEREFORE, pursuant to 4 CSR 240-2.085, the undersigned respectfully requests that the Commission issue its standard Protective Order in this proceeding that contains both of the Highly Confidential and Proprietary categories so that the respondents may respond to data requests in a confidential manner if a particular response so qualifies.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

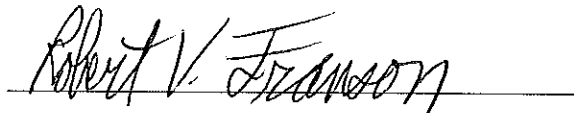
A handwritten signature in cursive script, reading "Robert V. Franson", written over a horizontal line.

Robert V. Franson  
Associate General Counsel  
Missouri Bar No. 34643

Attorney for the Staff of the  
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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 as shown on the attached service list this 3<sup>rd</sup> day of August, 2001.

A handwritten signature in cursive script, reading "Robert V. Franson", written over a horizontal line.

**Service List for**  
**Case No. GR-2001-388/GR-2001-39**  
**Verified: August 3, 2001 (cgo)**

**Office of the Public Counsel**  
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