

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

In the matter of the Application of Central)	
Jefferson County Utilities, Inc. for an order)	
authorizing the transfer and assignment)	Case No. SO-2007-0071
of certain water and sewer assets to Jefferson)	
County Public Sewer District and in connection)	
therewith, certain other related transactions.)	

MOTION FOR PROTECTIVE ORDER

Comes now Central Jefferson County Utilities, Inc. (Central Jefferson), 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 anticipates being asked through 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") or interveners, 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 certain material that 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.

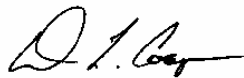
2. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of “highly confidential” and “proprietary.”

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,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was sent via U.S. Mail or electronic mail on this 20th day of November, 2006, to:

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