

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

In the Matter of Missouri Gas Utility's	)	
Purchased Gas Adjustment (PGA) Factors	)	Case No. GR-2007-0178
To be Audited in Its 2006-2007 Actual Cost	)	
Adjustment.	)	

**MOTION FOR PROTECTIVE ORDER**

Comes now Missouri Gas Utility, Inc. (MGU 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 has been 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.

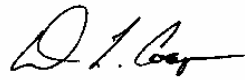
2. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary."

3. MGU understands that the Commission has recently promulgated a rule that will ultimately make this type of request unnecessary (Commission Rule 4 CSR 240-2.135). However, it is also MGU's understanding that the referenced rule will not become effective until January 30, 2007. MGU, on the other hand, is required to respond to certain data requests prior to the date the rule will become effective.

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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ATTORNEYS FOR  
MISSOURI GAS UTILITY, INC.

## **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail on January 4<sup>th</sup>, 2007, to the following:

Lera Shemwell  
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