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June 23, 1999

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

**FILED**  
JUN 23 1999  
Missouri Public  
Service Commission

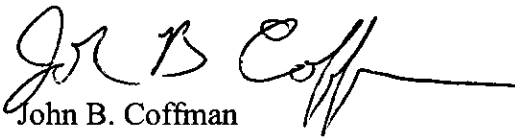
**RE: In the matter of 4 CSR 240-20.015 Proposed Rule -  
Electric Utilities Affiliate Transactions, Case No. EX-99-442**

Dear Mr. Roberts:

Enclosed for filing in the above referenced case, please find the original and 14 copies of the Public Counsel's **Request for Protective Order**. Please "file stamp" the extra enclosed copy and return it to this office. I have on this date mailed, faxed, or hand-delivered the appropriate number of copies to all counsel of record.

Thank you for your attention to this matter.

Sincerely,

  
John B. Coffman  
Deputy Public Counsel

JBC:kh

cc: Counsel of Record

Enclosure

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

**FILED**

JUN 23 1999

Missouri Public  
Service Commission

In the matter of 4 CSR 240-20.015 proposed )  
Rule - electric utilities affiliate transactions. )

**Case No. EX-99-442**

**REQUEST FOR PROTECTIVE ORDER**

**COMES NOW** the Office of the Public Counsel (Public Counsel) and for its Request states as follows:

1. Public Counsel is preparing comments to be submitted to the Public Service Commission in this important rulemaking proceeding. Public Counsel hopes to convince the Commission that strong rules governing affiliate transactions are essential to protect utility consumers now and in the future. In order to fully explain to the Commission the nature and extent of the current problem by showing how consumers are harmed by various affiliate transactions and relationships, it will be necessary to reference information that has been deemed to be highly confidential.

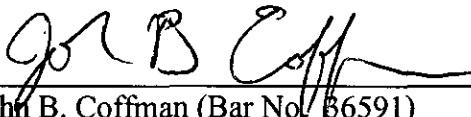
2. Public Counsel believes that it would be appropriate for the Commission to issue its standard protective order in this proceeding in order to allow parties to provide highly confidential comments under seal. Missouri case law also recognizes that the public interest is promoted by full disclosure of relevant information in Commission proceedings through procedures that allow for the presentation of highly confidential data through a procedure that protects and restricts the sensitivity of such information. State ex rel. UCCM v. Public Service Commission, 562 S.W.2d 688, 694 (Mo. App. 1978).

WHEREFORE Public Counsel respectfully requests that the Commission issue its standard protective order in this proceeding on an expedited basis so that highly confidential information may be provided under seal on the date provided for initial comments (July 1, 1999).

Respectfully submitted,

**OFFICE OF THE PUBLIC COUNSEL**

BY:

  
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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document has been either faxed, mailed, or hand-delivered to the following counsel of record on this 23rd day of June, 1999:

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