

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

Marlyn Young,)	
)	
Complainant,)	
)	
v.)	Case No. EC-2006-0283
)	
Union Electric Company,)	
d/b/a AmerenUE,)	
)	
Respondent.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE 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 ordered to respond to the Complaint filed by Marlyn Young (Complainant).
2. The Company's response, in answering the allegations set forth by Complainant, provides certain information that relates directly to Complaint's accounts, including account numbers and balance information. This information is properly treated as Confidential as defined in the Commission's standard-form protective order. None of the information for which a claim of confidentiality is made can be found in any format in a public document.
3. Therefore, because there is a potential for public disclosure of highly confidential 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.” The Commission has historically issued protective orders in cases similar to the present one.

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,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

By: Thomas M. Byrne

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Dated: February 2, 2006

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Protective Order was served via electronic filing and electronic mail (e-mail) or via regular mail on this 2nd of February, 2006, to:

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