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

In the Matter of the Application of TCG St. Louis	)	
To Expand its Certificate of Basic Local Exchange	)	Case No.
Telecommunications Service Authority to the	)	
Jefferson City, Missouri Exchange.	)	

## TCG ST. LOUIS' MOTION FOR PROTECTIVE ORDER

TCG St. Louis, pursuant to 4 CSR 240-2.085(2), requests the Missouri Public Service Commission ("Commission") issue a Protective Order to facilitate the proceedings in this case.

- 1. TCG St. Louis, concurrent with this Motion, has filed an application to expand its certificate of service authority to include the Jefferson City Exchange. As required by Commission rule 4 CSR 240-3.510(1)(D), TCG St. Louis has submitted supportive financial information with its Application. Specifically, TCG Missouri has submitted its Income Statement for the twelve months ending December 31, 2007 (Attachment 1) and its Balance Sheet as of December 31, 2007 (Attachment 2). This information is nonpublic financial information.
- 2. TCG St. Louis requests Highly Confidential treatment for this financial information because its public disclosure would be competitively harmful to the Company in that the disclosure of this information at a state-specific level would allow the Company's competitors to determine the extent of the Company's business operations. It would also allow competitors to determine the extent of the Company's network facilities, operating revenue and expenses, customer base and other competitively sensitive information to the detriment of the Company. This financial information cannot be found in any format in any other public document and its public disclosure would harm the company' business interests.

WHEREFORE, TCG St. Louis requests the Commission issue its standard Protective Order and that it classify as "Highly Confidential" Attachments 1 and 2 to TCG St. Louis' Application for Expansion of Basic Local Exchange Telecommunications Service Authority.

Respectfully submitted,

TCG ST. LOUIS

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## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on April 4, 2008.

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