BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

)

)

)

)

)

In the Matter of the tariff filing of Algonquin Water Resources of Missouri, LLC to implement a general rate increase for water and sewer service provided to customers in its Missouri service areas.

Cases Nos. WR-2006-0425 SR-2006-0426

MOTION FOR PROTECTIVE ORDER

Comes now Algonquin Water Resources of Missouri, LLC (Algonquin 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 may seek to provide in testimony, and anticipates being asked through Commission Staff ("Staff") 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"), 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,

<u>//S//</u>

Dean L. Cooper Mo. Bar 36592 BRYDON, SWEARENGEN & ENGLAND P.C. 312 East Capitol Avenue P.O. Box 456 Jefferson City, MO 65102-0456 Telephone: (573) 635-7166 Facsimile: (573) 635-0427 dcooper@brydonlaw.com

ATTORNEYS FOR ALGONQUIN WATER RESOURCES OF MISSOURI, LLC

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 25th day of May, 2006, to:

Office of the General Counsel Missouri Public Service Commission Governor's Office Building 200 Madison Street P.O. Box 360 Jefferson City, Missouri 65102 Office of the Public Counsel Governor's Office Building 200 Madison Street P.O. Box 7800 Jefferson City, Missouri 65102

<u>//S//</u>___

Dean L. Cooper