

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

In the Matter of the Application of)	
The Empire District Gas Company for a)	Case No. GT-2007-0207
Waiver from the application of certain)	Tariff Filing YG-2007-0375
Tariff language regarding refunds.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW The Empire District Gas Company (“EDG” 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. This proceeding involves certain customer refunds relating to the Southern Star Central Pipeline Kansas *ad Valorem* tax. Certain information expected to be provided to the Staff, Office of the Public Counsel, and possibly other parties, through data requests, workpapers and other documents, necessarily will contain customer-specific information. Depending on how this proceeding progresses, the Company also may find it necessary to provide in pre-filed testimony information which could contain such customer-specific information, along with possibly 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 possibly utilized in testimony by Staff, as well as by the Office of the Public Counsel (“OPC”) or other intervenors, 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.

2. Public disclosure of the above-referenced material may tend to harm the interests of the Company, its employees and its customers. None of the information for which a claim of confidentiality may be made can be found in any format in a public document.

3. 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,

/s/ Charles Brent Stewart

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COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was sent to all counsel of record in Case No. GT-2007-0207 by electronic mail transmission, this 4th day of December, 2006.

/s/ **Charles Brent Stewart**
