LATE
Filed after deadline

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JULY 10, 2001

REC'D AT 4:10
ON 7/10/01

Secretary
Missouri Public Service Commission
Governor Office Building
Jefferson City, MO 65101

RE: TXUES v. MGE Case No. 2001-593

Enclosed please find for filing and original and Eight (8) copies of Complainants' Motion for Protective Order which I asked be filed in the above-referenced file.

If you have any questions regarding this matter, please do not hesitate to contact me.

Very Truly Yours,

Donald C. Otto, Jr.

cc: General Counsel's Office
Office of Public Counsel
All parties of record

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In Re:		
TXU ENERGY SERVICES, INC., and SCHREIBER FOODS, INC	)	
Complainants	)	
vs.	)	Case No. GC-2001-593
MISSOURI GAS ENERGY, A DIVISION OF SOUTHERN UNION COMPANY,	)	
Respondent	)	

MOTION FOR PROTECTIVE ORDER

Comes now Complainants and, for their Motion for a Protective Order, states as follows :

1. Respondent has served upon Complainants certain Data Requests seeking the contracts between the Complainants and between Complainants and Williams Pipeline company.
2. While Complainants do not object to these requests as the are clearly relevant to the proceedings, the contracts requested are confidential in nature and are the product of confidential negotiations between the parties. The contracts contain terms which the parties may or may not have negotiated or may in the future wish to negotiate with other

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customers or vendors and contain information that would allow competitors to determine the needs and capacities of the parties and, if publicly disclosed, would compromise information considered by the parties to be confidential and place the Complainants at a competitive disadvantage. Finally, the contracts in question involve, in part, Williams Pipeline Co., which is not a party to this Complaint.

3. For these reasons, a Protective Order is appropriate to protect the information in these contracts from public disclosure or to persons or entities not involved in the instant matter or for use by any party to this matter other than in connection with the instant Complaint and for the return of any and all copies of said contracts to the respective parties at the close of this matter.
4. As discovery in this matter has only recently begun and as further Data Requests from all parties are anticipated, said Protective Order should cover all aspects of potential confidential or proprietary information disclosure in the Complaint process and be applicable to all parties, including Complainants.
5. Counsel for the Complainants has discussed this matter with counsel for the Respondent , the Office of Public Counsel and for the Commission who have informed the undersigned they have no objection to the Commission issuing Its standard Protective Order in this matter.

Respectfully Submitted,

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ATTORNEY FOR COMPLAINANTS

CERTIFICATE OF SERVICE

Comes now the undersigned and hereby states that a true and accurate copy of the foregoing was hand-delivered to each party of record this 19 day of July, 2001.