

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
JUN 08 2001

Missouri Public
Service Commission

In the Matter of the tariff filing of Missouri)
Public Service ("MPS") a division of)
UtiliCorp United Inc., ("UtiliCorp") to)
implement a general rate increase for)
retail electric service provided to customers)
in the Missouri service area of MPS)

Case No. ER-2001-672

MOTION FOR PROTECTIVE ORDER

COMES NOW UtiliCorp United Inc. ("UtiliCorp") d/b/a Missouri Public Service ("MPS"), by counsel, and for its Motion for Protective Order pursuant to 4 CSR 240-2.085(2), respectfully states as follows to the Missouri Public Service Commission ("Commission"):

1. Contemporaneously herewith, MPS is filing with the Commission certain tariff sheets consisting of revised electric rate schedules designed to implement a general rate increase for retail electric service provided to customers in its Missouri service area. Also contemporaneously herewith, MPS is filing with the Commission the direct testimony and schedules of various MPS witnesses, including the direct testimony and schedules of MPS witness Stephen L. Ferry, which testimony contains certain Highly Confidential information, information which is not available to the general public and which cannot be found in any format in any public document. Included in Mr. Ferry's testimony is a discussion of certain nonpublic financial and business information including MPS's purchased power contracts and the involved capacity purchased demand charges, energy charges, and other information; contracted fuel prices; spot-market energy costs; outage contingent costs; and other similar items, the release of which would be harmful to MPS, its contracting parties as well as to its customers.

2. In addition, MPS anticipates that during the course of this general rate proceeding, other

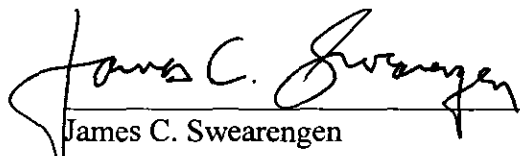
parties will likely undertake discovery which may lead to the disclosure by MPS of other Highly Confidential or Proprietary information and said parties may seek to introduce this information as evidence in this proceeding.

3. In view of the foregoing, MPS desires that the Commission issue in this case what has become known generally as its "standard form" protective order which contains both Highly Confidential and Proprietary categories.

4. Pursuant to 4 CSR 240-2.085(2) one (1) original and eight (8) copies of the public ("NP") version of Mr. Ferry's direct testimony and one (1) original and eight (8) copies of the complete ("HC") version of Mr. Ferry's direct testimony containing the information to be protected is being filed herewith. A Highly Confidential copy of said direct testimony will be provided to the Commission's General Counsel and to the Office of the Public Counsel.

WHEREFORE, MPS respectfully moves the Commission to issues its standard form protective order in this case.

Respectfully submitted,


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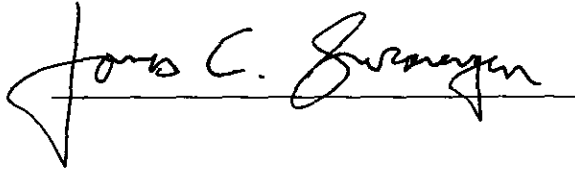
Attorneys for UtiliCorp United Inc. d/b/a Missouri Public Service

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered, on this 8TH day of June, 2001, to:

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

A handwritten signature in cursive script, reading "James C. Swamy", is written over a horizontal line. The signature is positioned to the right of a large, stylized left-pointing arrow.