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November 3, 2000

FILED<sup>3</sup>

NOV 03 2000

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**RE: UtiliCorp United Inc. - Case No. GO-2001-249**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Motion for Issuance of a Protective Order. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me.  
Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By:

*Dean Cooper*  
Dean L. Cooper *by Rg*

DLC/rhg

Enclosures

cc: Office of the Public Counsel  
Mr. Robert Franson, PSC  
Mr. Doug Micheel, OPC

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

FILED<sup>3</sup>  
NOV 03 2000  
Missouri Public  
Service Commission

In the Matter of an Investigation into various )  
issues related to UtiliCorp United Inc.'s )  
Gas Supply Services Department. )

Case No. GO-2001-249

**MOTION FOR ISSUANCE OF A PROTECTIVE ORDER**

Comes now UtiliCorp United Inc. ("UtiliCorp" or "Company") d/b/a Missouri Public Service, and, in support of its motion for issuance of the Missouri Public Service Commission's ("Commission") standard-form protective order, states as follows:

1. On October 16, 2000, the Staff filed its Motion to Open Case ("Motion") in which the Staff asked the Commission to open a docket for the purposes of investigating certain matters related to an anonymous letter received by the Commission. UtiliCorp filed its response to this motion on October 31, 2000, and stated therein that it did not oppose the opening of a case to facilitate the Staff's investigation of the specific allegations contained in the anonymous letter.

2. Although the Commission has not yet ruled on Staff's Motion, on October 30, 2000, the Office of the Public Counsel ("Public Counsel") directed twenty (20) data requests to UtiliCorp which carried the above case number. Information which has been requested by the Public Counsel will contain -- and, additionally, information which may be requested during the Staff's investigation, through additional discovery initiated by the Public Counsel and through discovery initiated by other parties, 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 the material which the Staff, Public Counsel, or others may seek in discovery may tend to harm the interests of UtiliCorp, its employees and its customers.

3. In addition, UtiliCorp anticipates that if testimony is required by the Commission, some of the testimony and exhibits filed by itself and other parties to this proceeding may make reference to, or include, information of a confidential or proprietary nature.

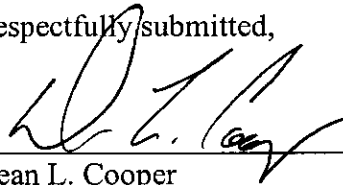
4. Therefore, because Commission Rule 4 CSR 240-2.090 would require UtiliCorp to respond to the Public Counsel's data requests within twenty (20) days and there is a potential for public disclosure of confidential or proprietary information without a protective order in place, UtiliCorp moves the Commission to issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary."

WHEREFORE, UtiliCorp 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,



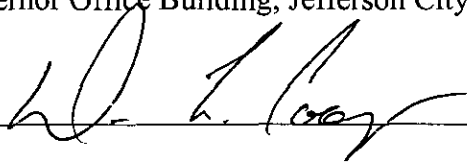
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ATTORNEYS FOR UTILICORP UNITED INC.  
D/B/A MISSOURI PUBLIC SERVICE

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was either hand-delivered or mailed, U.S. Mail, postage prepaid, on the 3<sup>rd</sup> day of November, 2000, to: Robert V. Franson, Public Service Commission, Governor Office Building, Jefferson City, Mo 65101; and, the Douglas Micheel, 6th Floor, Governor Office Building, Jefferson City, Mo 65101.



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