



**MISSOURI GAS ENERGY**

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**ROBERT J. HACK**

*Vice President, Pricing & Regulatory Affairs*

December 4, 2000

**FILED**

**DEC - 6 2000**

**Missouri Public  
Service Commission**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Missouri 65102-0360

**RE: Case No. GR-2001-292, Missouri Gas Energy**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter, please find an original and eight (8) conformed copies of **Missouri Gas Energy's Motion For Protective Order**.

A copy of this filing has been mailed or hand-delivered this date to counsel of record.

Thank you for bringing this matter to the attention of the Commission. Please call me if you have any questions regarding this matter.

Sincerely,

C: F. Jay Cummings  
Gary W. Duffy  
Thomas R. Schwarz, Jr.  
Douglas E. Micheel  
Larry W. Dority

Enclosures

FILED

DEC - 6 2000

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the matter of Missouri Gas Energy's )  
tariff sheets designed to increase rates )  
for gas service in the company's Missouri )  
service area. )

Case No. GR-2001-292

**MISSOURI GAS ENERGY'S MOTION FOR PROTECTIVE ORDER**

Comes now Missouri Gas Energy ("MGE"), a division of Southern Union Company, by and through counsel, and for its motion for protective order pursuant to 4 CSR 240-2.085 respectfully states the following:

1. MGE expects that discovery to be submitted by the Commission's Staff and the Office of the Public Counsel, and perhaps other parties, will seek sensitive information that should be protected from public disclosure. Public disclosure of market sensitive material, including customer-specific data, employee-specific data and other similar information that may be requested from MGE in the course of this proceeding could cause harm to MGE and its customers by increasing the company's costs or reducing the company's revenues. In addition, to the best of MGE's information, knowledge and belief, none of the information for which a claim of confidentiality will be made can be found in any format in any public document.

2. To protect such sensitive information from public disclosure, MGE suggests that it is appropriate for the Commission to issue it standard protective order.

**Wherefore**, MGE respectfully requests that the Commission issue its standard

protective order in this docket.

Respectfully Submitted,



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ATTORNEYS FOR MISSOURI  
GAS ENERGY

**Certificate of Service**

I hereby certify that a copy of the foregoing document was mailed or hand delivered this 4<sup>th</sup> day of December, 2000, to:

Larry W. Dority  
Fischer & Dority, P.C.  
101 Madison Street, Suite 400  
Jefferson City, MO 65101

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

Thomas R. Schwarz, Jr.  
Missouri Public Service Commission  
P.O. Box 360  
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