

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

In the matter of Aquila, Inc. d/b/a Aquila	)	
Networks-MPS and Aquila Networks-L&P, for	)	
authority to file tariffs increasing electric rates for	)	Case No. ER-2007-0004
the service provided to customers in the Aquila	)	
Networks-MPS and Aquila Networks-L&P	)	
service areas.	)	

**MOTION FOR PROTECTIVE ORDER**

Comes now Aquila, Inc. (Aquila 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. The Company is seeking to provide in testimony, and anticipates being asked through data requests, to provide 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 utilized in testimony by the Staff, as well as the Office of the Public Counsel (OPC) or interveners, 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 certain material that the Staff, OPC, or others may seek in discovery may tend to harm the interests of the Company, its employees and its customers. None of the information for which a claim or confidentiality will be made can be found in any format in a public document.

2. 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,

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Dean L. Cooper                              Mo. Bar 36592  
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ATTORNEYS FOR AQUILA, INC.

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 3<sup>RD</sup> day of July, 2006, to:

Steve Dottheim  
Missouri Public Service Commission  
Governor’s Office Building  
200 Madison Street  
P.O. Box 360  
Jefferson City, Missouri 65102  
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//S//

Dean L. Cooper