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September 30, 2003

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

**Re: Case No. GT-2004-0050**

Dear Mr. Roberts:

Provided herewith for filing on behalf of Aquila, Inc. d/b/a Aquila Networks - MPS, please find in electronic format a Motion for Protective Order.

A copy of this filing is being provided to all parties of record.

Please see that this filing is brought to the attention of the appropriate Commission personnel.

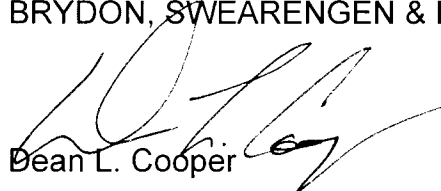
I thank you in advance for your cooperation in this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND, P.C.

By:

Dean L. Cooper



DLC/lar

Attachment

cc: Lera Shemwell  
Doug Micheel  
Stuart Conrad

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

In the Matter of Aquila, Inc. d/b/a )  
Aquila Networks - MPS for Tariff ) Case No. GT-2004-0050  
Changes Related to Large Volume Service )

**MOTION FOR PROTECTIVE ORDER**

COMES NOW Aquila, Inc. d/b/a Aquila Networks - MPS (“Aquila” or the “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 has filed with the Commission tariffs designed to effect changes to its large volume transportation service.

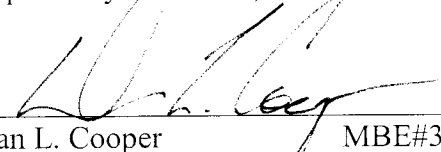
2. The Company may seek to provide in testimony, and has been asked through data requests, to provide competitive pricing information and technical, financial and business information of a confidential or proprietary nature. Additionally, it is anticipated that other information which may be requested or utilized in testimony by 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 referenced material which 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.

3. 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.” The Commission has historically issued protective orders in general rate cases.

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 MBE#36592  
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ATTORNEYS FOR AQUILA, INC. D/B/A  
AQUILA NETWORKS - MPS


### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered or sent by U.S. Mail, postage prepaid, on September 30<sup>th</sup> 2003, to the following:

Ms. Lera Shemwell  
Office of the General Counsel  
Governor Office Building, 8<sup>th</sup> Floor  
Jefferson City, Mo 65101

Mr. Douglas Micheel  
Office of the Public Counsel  
Governor Office Building, 6<sup>th</sup> Floor  
Jefferson City, MO 65101

Mr. Stuart W. Conrad  
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Penntower Office Center  
3100 Broadway, Suite 1209  
Kansas City, MO 64111

  
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