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August 7, 2001

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

FILED

AUG 7 2001

Missouri Public
Service Commission

RE: Case No. GR-2001-394

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **MOTION FOR PROTECTIVE ORDER**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Dennis L. Frey
Associate General Counsel
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DLF:ccl
Enclosure
cc: Counsel of Record

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

AUG 7 2001

Missouri Public
Service Commission

In the matter of Greeley Gas Company's)
Purchased Gas Adjustment Factors to be)
Reviewed in Its 2000-2001 Actual Cost)
Adjustment.)

Case No. GR-2001-394

MOTION FOR PROTECTIVE ORDER

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission ("Commission") and respectfully requests that the Commission issue a Protective Order in this proceeding. In support of this Motion, the Staff states as follows:

1. This case involves Greeley Gas Company's ("Greeley" or "Company") Purchased Gas Adjustment factors to be reviewed in its 2000-2001 Actual Cost Adjustment. As part of its discovery in this case, Staff has already served three sets of Data Requests on Greeley.

2. Based upon its prior experience and assertions by counsel for parties in other similar cases resulting in the issuance of a Protective Order, the Staff believes the Company may claim that certain information should not be made public, although it is relevant to the proceeding, because it is either: (a) "proprietary" in that the information contains trade secrets, as well as confidential or private technical, financial, and business information; or (b) "highly confidential" in that it concerns (1) material or documents that contain information relating directly to specific customers; or (2) market-specific information relating to services offered in competition with other parties or non-parties. Among other things, this information may contain: customer specific information,

competitive pricing information, trade secrets, confidential technical financial and business information or other material of a confidential proprietary nature.

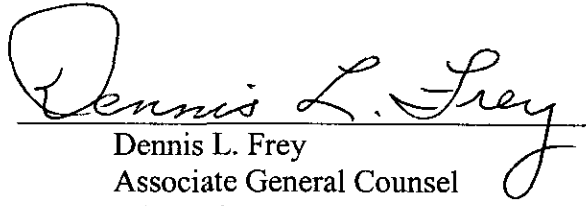
3. The information may become a part of the report filed with the Commission and would therefore become publicly available through that filing, as well as through subsequent proceedings in this case, without a protective order in place. Staff anticipates that Greeley will allege that the public disclosure of this information will harm the Company's business interests, and that the information subject to the proposed Protective Order will not be found in any publicly available document.

5. Counsel for the Company and Office of the Public Counsel have no objection to this request for a standard Protective Order.

WHEREFORE, pursuant to 4 CSR 240-2.085, the Staff respectfully requests that the Commission issue in this proceeding its standard Protective Order, containing both of the Highly Confidential and Proprietary categories, so that the respondents may respond to data requests in a confidential manner if a particular response so qualifies.

Respectfully submitted,

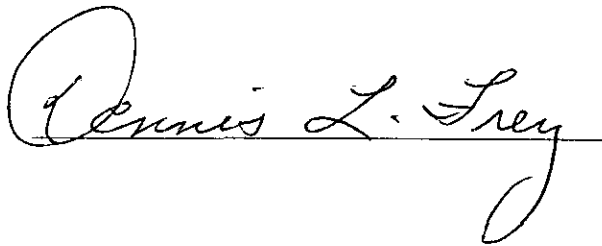
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 7th day of August 2001.



Service List for
Case No. GR-2001-394
Revised: August 7, 2001 (ccl)

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