



Missouri Public Service Commission

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December 1, 1998

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DANA K. JOYCE
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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

DEC 1 1998

RE: **GA-99-107 and GA-99-236**

Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) 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,

Lera L. Shemwell by SD

Lera L. Shemwell
Assistant General Counsel
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Enclosure
cc: Counsel of Record

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

In the matter of the application of Union)
Electric Company d/b/a AmerenUE for a)
certificate of public convenience and)
necessity authorizing it to construct,)
install, own, operate, control, manage and)
maintain natural gas pipeline facilities)
and a gas distribution system for the)
public in a portion of St. Charles County,)
Missouri, as an expansion of its presently)
certificated area..)

Case No. GA-99-107

FILED

DEC 1 1998

Missouri Public
Service Commission

In the matter of the application of Laclede)
Gas Company for a certificate of public)
convenience and necessity authorizing it)
to construct, install, own, operate, control,)
manage, and maintain a gas distribution)
system for the public in portions of the)
city of Wentzville, Missouri as an)
extension of its presently certificated area.)

Case No. GA-99-236

MOTION FOR PROTECTIVE ORDER

COMES NOW the Staff of the Missouri Public Service Commission and for this Motion
for Protective Order respectfully states as follows:

1. On September 15, 1998, Union Electric Company d/b/a AmerenUE filed an application
with the Commission requesting a certificate of public convenience and necessity for authorization
to construct, own, and operate natural gas pipeline facilities and a gas distribution system for the
public in a portion of St. Charles County.

2. On October 19, 1998, Laclede Gas Company ("Laclede") filed an application to intervene.
The Commission granted Laclede's application in an order that became effective on November 13,
1998.

3. In that same order the Commission ordered a prehearing conference to be held on November 30, 1998 to establish a proposed procedural schedule.

4. On November 24, 1998, Laclede filed an application with the Commission requesting authority to provide natural gas service to a portion of St. Charles County that consists of a portion of the city of Wentzville, Missouri.

5. Laclede has also filed a Motion to Consolidate these two cases. None of the parties attending the pre-hearing conference expressed any opposition to the motion.

6. At the pre-hearing conference, the parties agreed that some information that may be used in support of their positions includes customer specific information that is highly confidential and/or proprietary. Further, the parties anticipate that responses to discovery requests or to other information requests from the parties in this docket may also contain highly confidential and/or proprietary information.

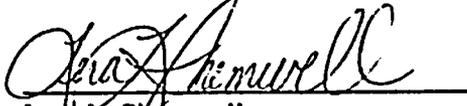
7. The parties, therefore, respectfully request that the Commission issue a protective order to allow customer specific or other highly confidential information to be filed under seal. This approach will avoid delays in obtaining responses to discovery and will allow this case to proceed expeditiously.

8. The Commission has recognized the need to protect certain confidential information from disclosure in prior cases. The issuance of a protective order has minimized disputes and has provided a sound method for submitting confidential information.

WHEREFORE, the parties to this case request that the Commission issue its standard protective order in this docket.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Lera L. Shemwell
Assistant General Counsel
Missouri Bar No. 43792



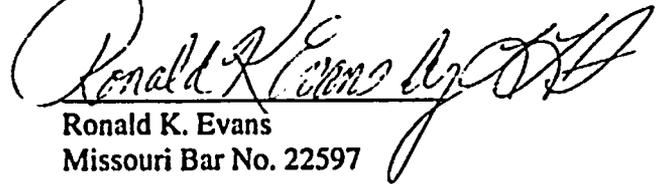
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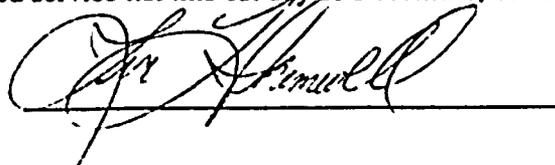
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, faxed, or hand-delivered to all parties of record as shown on the attached service list this 1st day of December, 1998.



SERVICE LIST FOR
CASE NO: GA-99-107 and GA-99-236
December 1, 1998

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