

LAW OFFICES
BRYDON, SWEARENGEN & ENGLAND

DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
GARY W. DUFFY
PAUL A. BOUDREAU
SONDRA B. MORGAN
CHARLES E. SMARR

PROFESSIONAL CORPORATION
312 EAST CAPITOL AVENUE
P.O. BOX 456
JEFFERSON CITY, MISSOURI 65102-0456
TELEPHONE (573) 635-7166
FACSIMILE (573) 635-3847
E-MAIL: DCOOPER@BRYDONLAW.COM

DEAN L. COOPER
MARK G. ANDERSON
TIMOTHY T. STEWART
GREGORY C. MITCHELL
BRIAN T. MCCARTNEY
DALE T. SMITH
BRIAN K. BOGARD

OF COUNSEL
RICHARD T. CIOTTONE

July 25, 2001

Mr. Dale Hardy Roberts
Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED²
JUL 25 2001
Missouri Public
Service Commission

RE: Missouri Public Service - Case Nos. GR-2001-461 and GR-2000-520 Consolidated

Dear Mr. Roberts:

Enclosed for filing in the above-referenced proceeding please find an original and eight copies of a Motion for Protective Order. Please stamp the enclosed extra copy "filed" and return same to me.

If you have any questions concerning this matter, then please do not hesitate to contact me. Thank you very much for your attention to this matter.

Sincerely,

BRYDON, SWEARENGEN & ENGLAND P.C.

By: *Dean Cooper* *by RS*
Dean L. Cooper

DLC/rhg

Enclosures

cc: Office of the Public Counsel
Mr. Robert Franson, General Counsel
Mr. Kent Kopetzky

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
JUL 25 2001
Missouri Public
Service Commission

In the Matter of Missouri Public Service's)
Purchased Gas Adjustment factors to be reviewed) Case No. GR-2001-461
in its 2000-2001 Actual Cost Adjustment.)

In the Matter of Missouri Public Service's)
Purchased Gas Adjustment factors to be reviewed) Case No. GR-2000-520
in its 1999-2000 Actual Cost Adjustment.)

MOTION FOR PROTECTIVE ORDER

COMES NOW UtiliCorp United Inc. d/b/a Missouri Public Service (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, as necessary, concerning Case No. GR-2000-461, states as follows:

1. The above cases were consolidated by the Commission's Order Consolidating Cases and Order Establishing Procedural Schedule issued on May 22, 2001, with Case No. GR-2001-461 being the lead case.
2. The Commission previously issued an Order Granting Protective Order in Case No. GR-2000-520 on December 6, 2000.
3. As a part of the actual cost adjustment proceeding assigned Case No. GR-2001-461, the Company has now been asked by the Commission Staff ("Staff"), 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 by the Staff, as well as the Office of the Public Counsel ("OPC") during discovery in this case, 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.

4. In addition, the Company anticipates that if testimony is required by the Commission, some of the testimony and exhibits filed by itself and other parties to this proceeding may make reference to, or include, information of a confidential or proprietary nature.

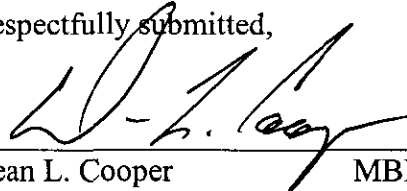
5. Therefore, because there is a potential for public disclosure of confidential or proprietary information without a protective order in place, the Company moves the Commission to issue in this case its standard-form protective order containing classifications of "highly confidential" and "proprietary," to the extent these matters are not addressed by the Order Granting Protective Order in Case No. GR-2000-520.

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, to the extent these matters are not addressed by the Order Granting Protective Order in Case No. GR-2000-520; and,

(b) grant such further relief as the Commission deems appropriate.

Respectfully submitted,



Dean L. Cooper MBE #36592
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Avenue
P. O. Box 456
Jefferson City, MO 65102
(573) 635-7166
(573) 635-3847 facsimile
dcooper@brydonlaw.com

ATTORNEYS FOR UTILICORP UNITED INC.
D/B/A MISSOURI PUBLIC SERVICE

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was hand-delivered on July 25, 2001 to the following:

Robert Franson
Office of the General Counsel
Governor Office Building
Jefferson City, Mo 65101

Douglas Micheel
Office of the Public Counsel
Governor Office Building
Jefferson City, MO 65101

