

LACLEDE GAS COMPANY
720 OLIVE STREET
ST. LOUIS, MISSOURI 63101

AREA CODE 314
342-0532

MICHAEL C. PENDERGAST
ASSISTANT VICE PRESIDENT
ASSOCIATE GENERAL COUNSEL

July 26, 2001

FILED

JUL 27 2001

VIA FEDERAL EXPRESS

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
P. O. Box 360
Jefferson City, MO 65102-0360

RE: Case No. GR-2001-629

Dear Mr. Roberts:

Enclosed for filing, please find the original and eight copies of the Motion for Protective Order in the above-referenced case. Please file-stamp the additional copy of this Motion and return the same in the pre-addressed, stamped envelope provided.

Thank you for your consideration in this matter.

Sincerely,


Michael C. Pendergast

MCP:kz

cc: All parties of record

FILED

JUL 27 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Tariff to Revise Natural Gas Rate) Case No. GR-2001-629
Schedules.)

MOTION FOR PROTECTIVE ORDER

COMES NOW Laclede Gas Company ("Laclede" or "Company") and, pursuant to Rules 4 CSR 240-2.080 and 4 CSR 240-2.085 of the Commission's Rules of Practice and Procedure, respectfully requests that the Commission issue its standard Protective Order in the above captioned case. In support thereof, Laclede states as follows:

1. On May 18, 2001, Laclede filed revised tariff sheets which set forth revised rate schedules and certain revised charges for all of the operating divisions of Laclede.
2. Since that time Laclede has received numerous data information requests from the Commission Staff and the Office of the Public Counsel. A number of the data requests submitted by these parties have sought information of a highly confidential or proprietary nature relating to commercially-sensitive business functions and activities, financial considerations, and other non-public matters that could adversely affect Laclede and its customers if such information was publicly disclosed. None of the information for which Laclede seeks protection can be found in any format in any other public document.
3. The Commission has previously recognized in a variety of contexts the need to protect such sensitive information and that the issuance of a protective order will

serve to minimize any disputes among the parties and ensure that the Commission and the parties receive useful information in an appropriate manner. *See e.g.* various orders adopting protective order, Case Nos. ER-2001-299, GR-2001-292, TA-2001-289.

Laclede believes that the same considerations warrant issuance of a protective order in this case.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission issue its standard protective order in this proceeding providing for the protection of highly confidential and proprietary information.

Respectfully submitted,



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Associate General Counsel
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(314) 342-0532
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CERTIFICATE OF SERVICE

Michael C. Pendergast, Assistant Vice President and Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Motion for Protective Order has been duly served upon the General Counsel of the Staff of the Public Service Commission, Office of the Public Counsel and all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, on this 26th day of July, 2001.

Michael C. Pendergast