

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

In the matter of the Joint Application of Fidelity)
Natural Gas, Inc. and Laclede Gas Company)
for an order authorizing the sale and transfer)
of certain assets of Fidelity Natural Gas, Inc.)
located in Missouri to Laclede Gas Company)
and either authorizing the transfer of existing)
Certificates of Public Convenience and)
Necessity or granting a New Certificate of Public)
Convenience and Necessity to Laclede Gas)
Company in conjunction with same.)

Case No. GM-2006-_____

MOTION FOR PROTECTIVE ORDER

COME NOW Fidelity Natural Gas, Inc. ("Fidelity") and Laclede Gas Company ("Laclede") (collectively "Joint Applicants") and hereby request the Missouri Public Service Commission ("Commission") to issue a protective order in the above-captioned case. In support thereof, Joint Applicants state as follows:

1. In accordance with 4 CSR 240-2.085, and in order to facilitate the exchange of highly confidential and proprietary information and the preparation of a Staff Recommendation or a Stipulation and Agreement in this matter, the Joint Applicants hereby request the Commission issue a protective order in this proceeding. Simultaneously with the filing of this Motion, Joint Applicants filed their Joint Application which contains a Purchase and Sale Agreement between Fidelity and Laclede, dated as of September 1, 2005 (the "Agreement"), which is attached thereto as Appendix 1 and contains proprietary information. None of the information for which a claim of confidentiality is made can be found in any format in any other public document. The Joint Applicants request the Commission to issue its standard protective order, in the same form as has been customary in previous cases.

2. Joint Applicants note that the Commission has issued this standard protective order in numerous other dockets where it has recognized a genuine need to protect confidential information from disclosure. The issuance of protective orders in prior proceedings has helped to minimize disputes, and has provided a sound method for parties to submit confidential information.

WHEREFORE, for the reasons set forth herein, the Joint Applicants respectfully request the Commission to issue a protective order in this proceeding, in the same form as has been customary in previous cases.

Respectfully submitted,

/s/ James M. Fischer

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ATTORNEYS FOR
FIDELITY NATURAL GAS, INC.

/s/ Michael C. Pendergast

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ATTORNEYS FOR LACLEDE GAS COMPANY

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed, mailed or hand-delivered this 21st day of October, 2005, to:

General Counsel
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P.O. Box 360
Jefferson City, MO 65102

Public Counsel
Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102

/s/ James M. Fischer

James M. Fischer