

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

USW Local 11-6)	
)	
Complainant,)	
)	
v.)	
)	Case No. GC-2006-0390
Laclede Gas Company,)	
)	
Respondent.)	

**STAFF'S MOTION TO DESIGNATE THE ATTACHMENTS TO USW LOCAL 11-6'S
AMENDED COMPLAINT AS HIGHLY CONFIDENTIAL AND MOTION FOR
EXPEDITED TREATMENT**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully submits as follows:

1. On August 21, 2006, USW Local 11-6 filed its First Amended Complaint. Attached to that First Amended Complaint are approximately 66 pages of “exhibits.” These pages contain customer specific information such as addresses, comments regarding specific matters at these addresses, customer names, and phone numbers.

2. Staff believes that such information should be immediately reclassified as Highly Confidential. Section 386.480 prohibits the disclosure of such information. Investigations by Staff into complaints are Highly Confidential since there is specific customer information. See 4

CSR 240 2.070(10). Staff Counsel has been unable to reach USW Local 11-6 Counsel prior to the filing of this Motion. OPC and Laclede have no objection to this Motion.

3. Staff asks that the Commission contact the Attorney for USW Local 11-6 today to get agreement to reclassify this material or in the alternative order it reclassified as “Highly Confidential.” Staff also asks for Expedited Treatment of this Motion pursuant to 4 CSR 240-2.080(16). Staff asks that the Commission act on this Motion today. The benefit to the granting of this Motion is to remove customer specific information from the public domain that should not be in the public domain. This pleading was filed as soon as Staff Counsel became aware of this material.

4. Staff requests that the Commission either grant this Motion and reclassify this material in EFIS as “Highly Confidential” or contact USW Local 11-6 Counsel to withdraw and reclassify this information as “Highly Confidential.”

WHEREFORE, Staff requests that the Commission grant the relief sought by Staff today.

Respectfully submitted,

/s/ Robert V. Franson

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 22nd day of August, 2006.

/s/ Robert V. Franson