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July 13, 2001

Missouri Public Service Commission  
Attn: Secretary of the Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Mo. 65102-0360

RE: Case No. GM-2001-585

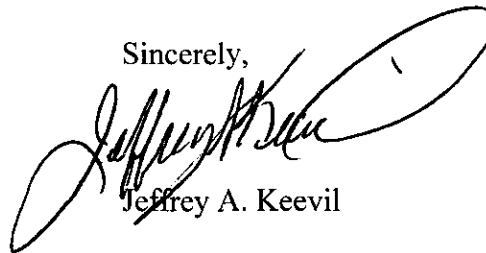
**FILED<sup>2</sup>**  
JUL 13 2001  
Missouri Public  
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of a statement with respect to the Highly Confidential designation of certain schedules to the direct testimony of David J. Ries on behalf of Gateway Pipeline Company, Inc, pursuant to the protective order issued in this case by the Commission.

Copies of this filing have on this date been mailed or hand-delivered to counsel of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er  
Enclosures  
cc: counsel of record

FILED<sup>2</sup>  
JUL 13 2001

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of the Joint Application of )  
Gateway Pipeline Company, Inc., ) Case No. GM-2001-585  
Missouri Gas Company and Missouri )  
Pipeline Company. )

**STATEMENT OF JOINT APPLICANT GATEWAY PIPELINE COMPANY,  
INC. WITH RESPECT TO HIGHLY CONFIDENTIAL DESIGNATION OF  
SCHEDULES 12 THROUGH 15 TO DIRECT TESTIMONY OF DAVID J. RIES**

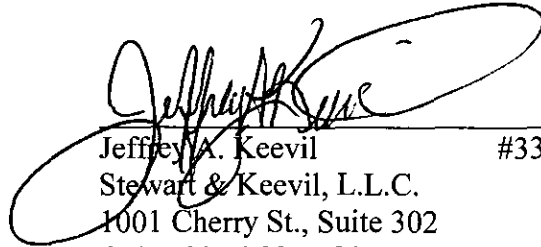
COMES NOW Gateway Pipeline Company, Inc. ("Gateway"), one of the joint applicants in the captioned case and, pursuant to paragraph I of Attachment A to the Commission's May 2, 2001, Order Granting Protective Order, states as follows:

1. On July 10, 2001, Gateway caused to be filed the prepared direct testimony of David J. Ries in this case.
2. Schedules 12 through 15 to Mr. Ries' testimony were designated as "Highly Confidential" and filed separately under seal with the Commission pursuant to the Commission's May 2, 2001, Order Granting Protective Order.
3. Pursuant to paragraph I to Attachment A of the Commission's May 2, 2001, Order Granting Protective Order, Gateway has made the "Highly Confidential" designation with respect to said schedules on the grounds that the schedules so designated contain information which is not available to the general public and which cannot be found in any format in any public document. The schedules contain pro forma consolidated statements and balance sheets for Gateway, a non-public corporation, relate to work produced by internal auditors or consultants, and accordingly contain non-public financial and business information, the release of which would be harmful to Gateway

and place Gateway at a competitive disadvantage in contract negotiations and with its competitors.

WHEREFORE, Gateway invokes the protection of the Commission's Protective Order in this case on the basis aforesaid.

Respectfully submitted,

  
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Attorneys for Gateway Pipeline Company, Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 13th day of July, 2001, to the following:

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