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July 13, 2001

FILED²
JUL 1 3 2001

Mr. Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Service Commission

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

Dear Mr., Roberts:

Enclosed please find the original plus eight (8) copies of Statement with Respect to Highly Confidential Designation of Selected Pages of Schedule RCK-4 to Richard C. Kruel's Direct Testimony for filing on behalf of Joint Applicants Missouri Pipeline Company and Missouri Gas Company in the above referenced matter. Please bring this matter to the attention of the appropriate Commission personnel. A copy of this filing is being sent to all parties of record.

Thank you for your attention to this matter.

Bv

Very truly yours,

BRYDON SWEARENGEN & ENGLAND P.C.

Paul A. Boudreau

email: paulb@brydonlaw.com

SBM/k Enclosures

cc: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Joint Application of		Vice Curi P.	
)	C	mmissic
Gateway Pipeline Company, Inc.,)	Case No. GM-2001-585	22/01
Missouri Gas Company and Missouri)		
Pipeline Company.	j		

STATEMENT OF JOINT APPLICANTS MISSOURI PIPELINE COMPANY AND MISSOURI GAS COMPANY WITH RESPECT TO HIGHLY CONFIDENTIAL DESIGNATION OF SELECTED PAGES OF SCHEDULE RCK-4 TO RICHARD C. KREUL'S DIRECT TESTIMONY

COME NOW Missouri Pipeline Company ("MPC") and Missouri Gas Company ("MGC"), Joint Applicants in the captioned case and, pursuant to paragraph I of Attachment A to the Commission's May 2, 2001, <u>Order Granting Protective Order</u>, state as follows:

- 1. On July 10, 2001, MPC and MGC, along with UtiliCorp United Inc., caused to be filed the prepared direct testimony of Richard C. Kreul in this case.
- 2. Certain pages to Schedule RCK-4 to Mr. Kreul's testimony were designated as "Highly Confidential" and filed separately under seal with the Commission pursuant to the Commission's May 2, 2001, <u>Order Granting Protective Order</u>.
- 3. Pursuant to paragraph I to Attachment A of the Commission's May 2, 2001, Order, MPC and MGC have made the "Highly Confidential" designation with respect to said pages of Schedule RCK-4 on the grounds that the pages 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 pages include customer-specific contractual information, salary information concerning individual employees and other non-public financial and business information, the release of which would be harmful to

MGC, MPC and Gateway Pipeline Company, as well as their customers and employees, and would place the joint applicants at a disadvantage in contract negotiations.

WHEREFORE, MPC and MGC invoke the protection of the Commission's Protective Order in this case on the basis aforesaid.

Respectfully submitted,

James C. Swearengen

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Paul A. Boudreau

#33155

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Attorneys for UtiliCorp United Inc., Missouri Pipeline Company and Missouri Gas Company

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:

Ms. Lera L. Shemwell Missouri Public Service Commission Governor Office Building 200 Madison Street P.O. Box 360 Jefferson City, MO 65102

Mr. Thomas M. Byrne Ameren Services Company 1901 Chouteau Avenue P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149 Ms. M. Ruth O'Neill Office of the Public Counsel Governor Office Building 200 Madison Street, Suite 650 P.O. Box 7800 Jefferson City, MO 65102

Mr. Michael Pendergast Laclede Gas Company 720 Olive Street, Room 1520 St. Louis, MO 63101 Mr. Jeffrey A. Keevil Stewart & Keevil, L.L.C. 1001 Cherry Street, Suite 302 Columbia, MO 65201 Mr. William D. Steinmeier William D. Steinmeier, P.C. 2031 Tower Drive P.O. Box 104595 Jefferson City, MO 65110-4595

Paul A. Boudreau