

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

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

STAFF RESPONSE TO USW LOCAL 11-6'S MOTION TO FILE TESTIMONY OUT OF TIME ABOUT NEWLY DISCOVERED EVIDENCE AND STAFF'S MOTION TO DECLASSIFY USW LOCAL 11-6'S MOTION

Comes now the Staff of the Missouri Public Service Commission (Staff) and respectfully submits as follows:

1. The Hearing in this case commenced on December 11, 2006 and continued on December 12, 2006. The hearing is currently set to resume on February 14, 2007.
2. On December 21, 2006, USW Local 11-6 filed its Motion to File Testimony Out of Time About Newly Discovered Drill-Through and Major Leak (Motion).
3. Staff first notes that USW Local's Motion is filed in EFIS only as a Highly Confidential document. Staff attempted to contact USW Local's Counsel by phone and email regarding this matter since a simple refileing by USW Local 11-6 with a public version would solve this problem. The response indicated that the classification of the Motion as Highly Confidential was intentional. Staff moves to declassify USW Local's Motion in its entirety.

Staff notes that it does not contain anything that even remotely appears to be Highly Confidential. Accordingly, Staff seeks a Commission Order declassifying USW Local 11-6's Motion in its entirety.

4. In view of the foregoing, the balance of Staff's Response will be labeled Highly Confidential.

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WHEREFORE, Staff respectfully requests that the Commission issue an Order consistent with Staff's Response.

Respectfully submitted,

/s/ Robert V. Franson

Robert V. Franson
Senior Counsel
Missouri Bar No. 34643

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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 29th day of December 2006.

/s/ Robert V. Franson