

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

In the Matter of the Application of Laclede)	
Gas Company for an Accounting Authority Order)	
Authorizing the Company to Defer for Future Recovery)	Case No. GU-2007-0137
the Costs of Complying With the Emergency)	
Amendment to the Commission's Cold Weather Rule)	

MOTION FOR PROTECTIVE ORDER

COMES NOW Laclede Gas Company ("Laclede" or "Company") and, pursuant to Rules 4 CSR 240-2.080 and 4 CSR 240-2.085 of the Commission's Rules of Practice and Procedure, respectfully requests that the Commission issue its standard protective order in the above captioned case. In support thereof, Laclede states as follows:

1. On December 13, 2005, the Commission issued its Order Approving Emergency Amendment (the "Emergency Amendment"), in which it amended, effective January 1, 2006, Commission Rule 4 CSR 240-13.055, entitled "Cold Weather Maintenance of Service," and known as the "Cold Weather Rule."

2. On August 11, 2006, the Commission issued its Order of Rulemaking in Case No. GX-2006-0434, in which it adopted on a permanent basis a number of the provisions that had been placed into effect as part of the Emergency Amendment (such provisions being hereinafter referred to as the "Permanent Amendment"). In addition to permitting customers to reconnect or maintain service by paying the lesser of 50% or \$500 of preexisting arrears, the Permanent Amendment also set forth terms explaining how gas utilities should calculate and recover the costs of complying with the Permanent Amendment. *See* 4 CSR 240-13.055(14)(F) and (G). The Permanent Amendment also specifies that gas utilities may continue to calculate and defer costs under the Emergency

Amendment upon the same terms as those set forth in the Permanent Amendment. 4
CSR 240-13.055(14)(F)4.

3. Pursuant to 4 CSR 240-13.055(14)(G)2, Laclede intends to file a request for determination of the cost of compliance with the Emergency Amendment for the winter of 2005-06. Such filing will be accompanied by customer-specific information, which is normally considered to be highly confidential. Accordingly, Laclede is filing this motion seeking a protective order in this case.

4. None of the information for which Laclede seeks protection can be found in any format in any other public document.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission issue its standard protective order in this proceeding providing for the protection of highly confidential and proprietary information.

Respectfully submitted,

/s/ Rick Zucker

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion for Protective Order has been duly served upon the General Counsel of the Staff of the Public Service Commission and the Office of the Public Counsel by hand delivery, email, fax, or United States mail, postage prepaid, on this 31st day of October, 2006.

/s/ Gerry Lynch

Gerry Lynch