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August 9, 2002

**FILED**

**AUG 09 2002**

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Missouri 65102

**Missouri Public  
Service Commission**

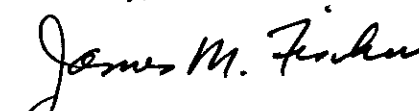
RE: *Laclede Gas Company's Purchased Gas Adjustment Tariff Revisions*  
Case Nos. GR-2001-387 and GR-2000-622.

Dear Mr. Roberts:

Enclosed for filing in the above-referenced matter is an original and eight (8) copies of (1) Motion For Protective Order, and (2) Response Of Laclede Gas Company To Staff Recommendation. Exhibit 1 to the Response contains Highly Confidential information, and has been filed under seal, pursuant to the Commission rules.

Copies of the foregoing have been hand-delivered or mailed this date to the Office of the Public Counsel and Dana K. Joyce, General Counsel. Thank you for your attention to this matter.

Sincerely,

  
James M. Fischer

/jr

Enclosures

cc: Office of the Public Counsel  
Dana K. Joyce, General Counsel

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

AUG 09 2002

Missouri Public  
Service Commission

In the Matter of Laclede Gas Company's )  
Purchased Gas Adjustment Tariff )  
Revisions to be Reviewed in Its 2000- )  
2001 Actual Cost Adjustment. )

Case No. GR-2001-387

In the Matter of Laclede Gas Company's )  
Purchased Gas Adjustment Factors to be )  
Reviewed in Its 1999-2000 Actual Cost )  
Adjustment. )

Case No. GR-2000-622

**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 June 28, 2002 the Commission Staff filed its Recommendation (the "Recommendation") in the above referenced Case No. GR-2001-387. In the Recommendation, Staff raised an issue concerning the Company's Price Stabilization Program (the "PSP") and proposed that the Company relinquish \$4.9 million that it earned under the PSP.

2. In Laclede's Response to the Staff's Recommendation (the "Response"), Laclede attaches as an exhibit the tariff sheets and program description associated with

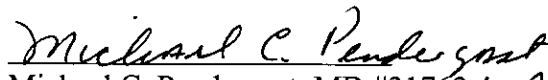
the PSP. Pursuant to the Protective Order issued in Case No. GO-98-484, the program description was filed as highly confidential. Therefore, in accordance with the Protective Order issued in Case No. GO-98-484, in filing the Response in this case, Laclede is attaching the program description in the same highly confidential manner as it was originally filed.

3. In the Protective Order issued in Case No. GO-98-484, the Commission recognized that the PSP case involved sensitive market-specific information and procurement strategies that could competitively disadvantage Laclede were such information publicly disclosed. Since the PSP is again at issue, Laclede again seeks issuance of a protective order. The same considerations warrant issuance of 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 proprietary and highly confidential information.

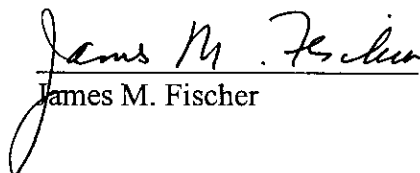
Respectfully submitted,

  
Michael C. Pendergast MB #31763 *by MT*  
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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 Office of the Public Counsel by placing a copy thereof in the United States mail, postage prepaid, or by hand delivery on this 9th day of August, 2002.

  
James M. Fischer