

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

5. The Commission has previously recognized in a variety of contexts the need to protect such sensitive information and that the issuance of a protective order will serve to minimize any disputes among the parties and ensure that the Commission and the parties receive useful information in an appropriate manner. The same considerations warrant issuance of a protective order in this case.

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 22nd day of September, 2006.

/s/ Gerry Lynch

Gerry Lynch