BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the PGA Filing for) Case No. GR-2005-0203 Laclede Gas Company)

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. This docket was originally opened in connection with regular PGA tariff filings made by Laclede for the purpose of adjusting its gas costs for the 2004-2005 ACA year. Following the end of an ACA year, the Missouri Public Service Commission Staff ("Staff") routinely audits the Company's ACA and Refund balances and submits its recommendation regarding these balances.

2. Accordingly, in early 2006, Staff began its audit of the Company's 2004-2005 ACA filing. In the ordinary course of such audits, it is common to receive data requests that seek highly confidential or proprietary information relating to commercially-sensitive business functions and activities, customer-specific information and other non-public matters that could detrimentally affect Laclede or its customers if publicly disclosed.

3. Laclede has already received a number of data requests that seek highly confidential or proprietary material. Parties receiving the information provided pursuant to these requests may seek to introduce the information as evidence in this proceeding.

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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.

> <u>/s/ Gerry Lynch</u> Gerry Lynch