

LACLEDE GAS COMPANY
720 OLIVE STREET
ST. LOUIS, MISSOURI 63101

AREA CODE 314
342-0532

MICHAEL C. PENDERGAST
ASSOCIATE GENERAL COUNSEL

FILED

MAR 19 1999

March 18, 1999

Missouri Public
Service Commission

VIA FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Harry S Truman Building
301 W. High Street, 5th Floor
Jefferson City, MO 65101

RE: Case No. GR-99-315

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case, please find an original and fourteen copies of a Motion for Protective Order in the above referenced case. Please see that this filing is brought to the attention of the appropriate Commission personnel.

Please file-stamp the additional copy of such filing and return the same in the pre-addressed, stamped envelope provided.

Thank you for your consideration in this matter.

Sincerely,


Michael C. Pendergast

MCP:jaa

cc: All Parties of Record

Enclosure

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

MAR 19 1999

Missouri Public
Service Commission

In the Matter of Laclede Gas Company's)
Tariff to Revise Natural Gas Rate) Case No. GR-99-315
Schedules)

MOTION FOR PROTECTIVE ORDER

COMES NOW Laclede Gas Company ("Laclede") and in support of its Motion for Protective Order in the above-captioned cause hereby states as follows:

1. The Staff ("Staff") of the Missouri Public Service Commission ("Commission") and the Office of the Public Counsel has issued data requests in the above-captioned case, in which they seek certain information and data from Laclede.

2. Based on Laclede's experience in previous rate case proceedings, it is anticipated that certain materials requested by Staff and other parties will involve highly sensitive or confidential information relating to employee matters, contract negotiations, individual customer service requirements, gas procurement strategies and/or other information that would place Laclede at a significant competitive disadvantage, were such materials (or the information contained therein) to be disclosed publicly. Therefore, there is a valid need to implement safeguards to protect such information from public disclosure.

3. Laclede accordingly requests that the Commission issue its Standard Protective Order in the above-captioned case. Laclede would note that the Commission has issued such protective orders in Laclede's prior rate case proceedings

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for the same reasons set forth herein. See Case Nos.
GR-98-374, GR-96-193 and GR-94-220.

WHEREFORE, Laclede requests that the Commission issue a
standard Protective Order applicable to all discovery in this
proceeding, and that it grant such further relief as the
Commission may deem just and proper.

Respectfully submitted,



Michael C. Pendergast
Associate General Counsel
Laclede Gas Company
720 Olive Street, Room 1520
St. Louis, MO 63101
(314) 342-0532
Missouri Bar No. 31763

CERTIFICATE OF SERVICE

Michael C. Pendergast, Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Motion for Protective Order in this case has been duly served upon all parties of record to this proceeding by placing a copy thereof in the United States mail, postage prepaid, on this 18th day of March, 1999.

Michael C. Pendergast