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RICHARD T CIOTTONE

November 27, 2002

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P O Box 360  
Jefferson City, MO 65102

**FILED<sup>3</sup>**

NOV 27 2002

Missouri Public  
Service Commission

**Re: Case No. GT-2003-0117**

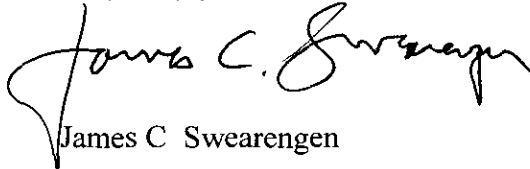
Dear Mr Roberts

Enclosed for filing on behalf of Laclede Gas Company, please find an original and eight (8) copies of a Motion for Protective Order

Would you please see that this filing is brought to the attention of the appropriate Commission personnel

I thank you in advance for your cooperation in this matter

Very truly yours,

  
James C Swearengen

JCS/lar  
Enclosure  
cc All Parties of Record

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

**FILED<sup>3</sup>**  
NOV 27 2002

Missouri Public  
Service Commission

In the Matter of the Tariff Filing of	)	
Laclede Gas Company to Implement	)	
An Experimental Low Income Assistance	)	Case No GT-2003-0117
Program called Catch-Up/Keep-Up	)	

**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 September 23, 2002, Laclede filed its verified motion for approval of a tariff in the above-captioned case, along with the tariff itself. Through the tariff, Laclede proposed a program referred to as "Catch-Up/Keep-Up" (the "Program") in an effort to implement an energy assistance program for its low-income customers.


2 Subsequent to the tariff filing, Laclede has received numerous data requests, some of which seek highly confidential or proprietary material. In the interest of time, Laclede has responded to these requests, and has marked such documents to indicate their confidential nature. On November 19, 2002, Staff witness David Sommerer filed testimony containing highly confidential information. Therefore, the need for a protective order has become apparent.

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

4       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. *See e.g.* **Re: Missouri Gas Energy**, Case No. GR-2001-292, Order Establishing Protective Order (issued December 7, 2000), and **Re: Empire District Electric Company**, Case No. ER-2001-299, Order Adopting Protective Order (issued November 28, 2000). 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 or proprietary information.

Respectfully submitted,

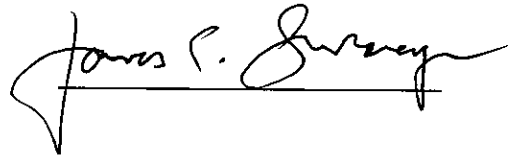


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**CERTIFICATE OF SERVICE**

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, Office of the Public Counsel and all other parties of record in this case by email, fax, or by placing a copy thereof in the United States mail, postage prepaid, on this 27th day of November, 2002

A handwritten signature in black ink, reading "James P. Surraney", is written over a horizontal line. The signature is cursive and stylized, with a large initial 'J' and 'S'.