BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Staff of the Missouri Public Service)	
Commission,)	
)	
Complainant,)	
)	
V.)	Case No. GC-2006-0491
)	
Missouri Pipeline Company, LLC;)	
Missouri Gas Company, LLC,)	
)	
)	
Respondents.)	

RESPONDENTS DESIGNATION OF DOCUMENTS

COME NOW Respondents Missouri Pipeline Company and Missouri Gas Company (hereafter "MPC" and "MGC") and for their response to the Order requiring designation of testimony, transcripts and exhibits and state as follows:

- 1. Respondent's have reviewed the Direct Testimony of Staff Witness Mr. Schallenberg including all Exhibits, which exhibits include the deposition of Ms. Hawkins, Mr. Wallen and Mr. Lodholz, as well as Volumes I and II of Mr. Ries' deposition and all exhibits to those depositions. Respondent's have also reviewed Volumes III, IV and V of Mr. Ries' deposition and all exhibits thereto..
- 2. Respondent's review was for purposes of determining what information would be reclassified as public or "Proprietary" (P) instead of "Highly Confidential" (HC).
- 3. Respondent's have reviewed thousands of pages of documents. Respondents' are delivering electronically to Staff and Interveners' counsel Mr. Schellenberg's Direct Testimony

as Mr. Ries' depositions Volumes I-V) with reclassified material. The documents delivered highlight in yellow those items which are classified as HC. No material was classified as Proprietary

- 4. Respondent's have attempted to limit, where appropriate, the HC material to sensitive information such as price, contract terms, identity of customers, sensitive operational items or third party marketers, gas volume data and similar sensitive information.
- 5. All Exhibits to Mr. Schallenberg's testimony and all exhibits to the depositions of Mr. Ries, Mr. Wallen, Mr. Lodholz and Ms. Hawkins, remain classified as HC, except for those exhibits listed below:

List of Exhibits to Mr. Schallenberg's Direct Testimony and the Exhibits to the Deposition of Mr. Ries, Mr. Wallen, Mr. Lodholz and Ms. Hawkins Which Can Be Classified as Public. All Other Exhibits Remain Classified as Highly Confidential.

- Court Order dated October 18, 2006, Case No. 06-4190-CV-C-SOW an Exhibit to Deposition of Mr. Ries.
- 2. Letter dated July 7, 2002 to FERC, Exhibit No.85 to Deposition of Mr. Ries.
- 3. FERC Order issued March 29, 2000, Exhibit 1 to Deposition of Mr. Ries.
- 4. Tariff Sheet No. 3 to MPC and MGC tariffs, Exhibit 5 to Deposition of Mr. Ries.
- 5. News Article, Exhibit 13 to Deposition of Mr. Ries.
- 6. Tariff Sheet No. 40 to MGC tariff, Exhibit 22 to Deposition of Mr. Ries.

7. MGC Tariff filed April 22, 1996, Exhibit 24 to Deposition of Mr. Ries.

8. MGC Tariff filed April 22, 1996, Exhibit 24 to Deposition of Mr. Wallen.

9. Rate Case Proceedings, Schedule 1-1 and 1-2 to Deposition of Mr. Schallenberg.

10. Case Summary of Involvement, Schedule 2-1, 2-2, 2-3, 2-4 of Direct Testimony

of Mr. Schallenberg.

WHEREFORE, Respondents respectfully request that the Commission accept as

appropriate the designation of testimony, attachments and deposition transcripts identified in the

voluminous material served on all parties.

Respectfully submitted,

LATHROP & GAGE, L.C.

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Attorneys for Respondents

CC 1754225v1

Dated: November 14th, 2006

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the Response to Staff's Motion to Release Public Information was transmitted by e-mail or mailed, First Class, postage prepaid, this 14th day of November, 2006, to:

Case No. GC-2006-0491

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_______/s/ Paul S. DeFord
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