

STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION

In the matter of	)	
	)	
USW Local 11-6,	)	GC-2006-0390
	)	
and	)	
	)	
Laclede Gas Company	)	

**USW 11-6's RESPONSE TO MOTION TO DESIGNATE ATTACHMENTS TO  
COMPLAINT AS HIGHLY CONFIDENTIAL**

Comes now USW 11-6 and in response to Staff's motion to designate attachments to USW 11-6's First Amended Complaint as "Highly Confidential" states as follows:

1. USW 11-6 does not oppose conditionally designating the attachments as "highly confidential" pending further review.

2. However, USW 11-6 notes that the documents largely consist of addresses not linked with customer names or telephone numbers. As such, the information is not confidential, because it can be found in any public telephone book, on the internet or by walking down a street. Almost without exception, the names and telephone numbers on the documents are those of Laclede employees who were noting the problems. The exceptions consist of public records (a transcript of a newscast and newspaper articles) and one customer complaint which USW 11-6 inadvertently failed to redact. The Union requests that the latter document, bates nos. 3-4, be marked highly confidential or that the Union be permitted to withdraw it and resubmit a redacted version.

3. Staff also noted in its motion that the attachments include "comments regarding specific matters at these addresses." USW 11-6 does not believe there is anything confidential about the notes contained on the documents.

Respectfully submitted,

/s/ Sherrie A. Schroder

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**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing was served on August 22, 2006, by United States mail, hand-delivery, email, or facsimile upon:

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