

**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.)	

RESPONSE TO STAFF'S MOTION TO RELEASE PUBLIC INFORMATION

COME NOW Respondents Missouri Pipeline Company and Missouri Gas Company (hereafter "MPC" and "MGC") and for their response to Staff's Motion to Release Public Information state as follows:

1. Staff indicates that, out of an abundance of caution, it filed the Direct Testimony and Exhibits of Robert E. Schallenberg as highly confidential and has likewise treated all of the deposition transcripts of Mr. Ries as highly confidential. Staff requests that Respondents inform it as to what material should remain designated as highly confidential. Staff requests that the designation of this material be provided by November 8, 2006.

2. Respondents are in the process of reviewing the voluminous material referenced by Staff for the purpose of determining what material should remain classified as proprietary or highly confidential. Respondents must review four days of depositions and exhibits for Mr. Ries, as well as depositions and exhibits of three other employees of the pipelines taken over a four-day period. Additionally, Respondents will review Mr. Schallenburg's direct testimony and exhibits comprised of two three-ring binders of filings to determine if any of the material is not

appropriately designated as HC. This process requires a fastidious review. Due to the volume of material that must be reviewed and Respondents Surrebuttal Testimony deadline of November 17, 2006, Respondents will need until at least December 1, 2006 to complete the process and deliver the material to Staff so that Staff may refile public versions of testimony and attachments as appropriate.

3. Staff indicates that, out of an abundance of caution, it filed the Direct Testimony and Exhibits of Robert E. Schallenberg as highly confidential and have likewise treated all of the deposition transcripts of Mr. Ries as highly confidential. Staff requests that Respondents inform it as to what material should remain designated as highly confidential. Staff requests that the designation of this material be provided by November 8, 2006.

4. Respondents are in the process of reviewing all of the material referenced by Staff for the purpose of determining what material should remain classified as proprietary or highly confidential. Due to the volume of material that must be reviewed, Respondents will need until at least December 1, 2006, to complete the process and deliver the material to Staff so that it may refile public versions of testimony in attachments as appropriate.

WHEREFORE, Respondents respectfully request that they be given until December 1, 2006 to deliver the appropriate designation for testimony, attachments and deposition transcripts.

Respectfully submitted,

LATHROP & GAGE, L.C.

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Dated: November 2nd, 2006

Attorneys for Respondents

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 2nd day of November, 2006, to:

Case No. GC-2006-0491

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