

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

In the Matter of a Proposed Rule to)	
Establish a Procedure for Handling)	Case No. AX-2003-0404
Confidential Information in)	
Commission Proceedings)	

**COMMENTS OF
LACLEDE GAS COMPANY**

Pursuant to the Notice published in the July 3, 2006 Missouri Register, Vol. 31, No. 13, Laclede Gas Company (“Laclede” or “Company”) respectfully submits the following comments in response to the Missouri Public Service Commission’s (“Commission”) Proposed Rule 2.135 on Confidential Information.

1. Currently, in every case involving confidential or proprietary information, the parties must go through the process of applying for a protective order. The Commission routinely approves the application and produces the standard protective order. Laclede believes that changing the current practice by effectively converting the standard protective order into a generally applicable rule is an excellent step that will avoid unnecessary labor and provide convenience for all stakeholders.

2. Laclede’s only comments to the Proposed Rule involve a clarification regarding service of highly confidential information and access to confidential information by *pro se* litigants.

3. Under Paragraph 4(B) of the Proposed Rule, a party disclosing highly confidential information may make such information available only on its own premises, while Paragraph 4(E) requires the disclosing party to serve highly confidential information on the requesting party’s attorney. These two subparagraphs should be

reconciled by clarifying that the requirements of Paragraph 4(E) are subject to the terms of Paragraph 4(B), such that Paragraph 4(E) should read: "Subject to subparagraph 4(B), the party disclosing information designated as highly confidential shall serve the information on the attorney for the requesting party."

4. The Commission entertains a number of customer complaint cases involving customer-specific information. Paragraphs 3 and 4 of the Proposed Rules should clarify that customers representing themselves *pro se* should be entitled to access to their own customer-specific information.

Respectfully submitted,

/s/ Rick Zucker

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Comments was served on the General Counsel of the Staff of the Missouri Public Service Commission and on the Office of the Public Counsel on this 2nd day of August, 2006 by hand-delivery, facsimile, electronic mail, or by placing a copy of such Comments, postage prepaid, in the United States mail.

/s/ Rick Zucker