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August 20, 2001

Missouri Public Service Commission  
Attn: Secretary of the Commission  
200 Madison Street, Suite 100  
P.O. Box 360  
Jefferson City, Mo. 65102-0360

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

AUG 20 2001

Missouri Public  
Service Commission

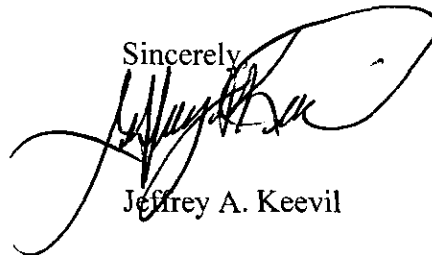
RE: Case No. GM-2001-585

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of a RESPONSE TO STATEMENT OF THE STAFF CONCERNING THE HIGHLY CONFIDENTIAL DESIGNATION OF PORTIONS OF STAFF'S TESTIMONY on behalf of Gateway Pipeline Company, Inc.

Copies of this filing have on this date been mailed or hand-delivered to counsel of record. Thank you for your attention to this matter.

Sincerely,



Jeffrey A. Keevil

JAK/er  
Enclosures  
cc: counsel of record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>

AUG 20 2001

Missouri Public  
Service Commission

In the Matter of the Joint Application of       )  
Gateway Pipeline Company, Inc.,                )  
Missouri Gas Company and Missouri            )  
Pipeline Company.                                )

Case No. GM-2001-585

**RESPONSE TO STATEMENT OF THE STAFF CONCERNING  
THE HIGHLY CONFIDENTIAL DESIGNATION OF PORTIONS  
OF STAFF'S TESTIMONY**

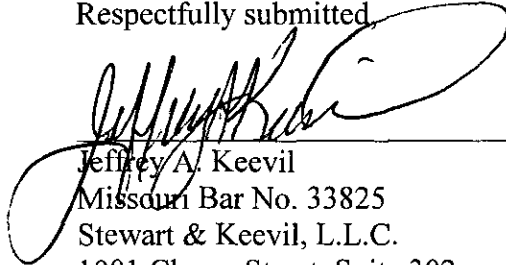
COMES NOW Gateway Pipeline Company, Inc. ("Gateway"), and for its response to the statement of the Staff concerning the highly confidential designation of portions of Staff's testimony filed on August 14, 2001, states as follows:

1. Some of the material designated by Staff as Highly Confidential in its testimony was not provided by Gateway; as to such material, Gateway cannot respond.
2. Some of the material designated by Staff as Highly Confidential in its testimony which was provided by Gateway was not designated as Highly Confidential by Gateway. Gateway's response to OPC's Data Request No. RO4, which is contained in Staff witness McKiddy's testimony as Highly Confidential, was not designated by Gateway as either Highly Confidential or Proprietary.
3. Some of the material designated by Staff as Highly Confidential in its testimony had previously been voluntarily declassified by Gateway, prior to Staff's filing. An example of this is the name Mogas Energy, LLC.
4. Staff's "statement" filed on August 14, 2001, only refers specifically to the testimony of Staff witness Morrissey. Since Gateway is currently in the process of

preparing its rebuttal testimony, this response will only specifically address the testimony of Staff witness Morrissey (and that portion of McKiddy's testimony addressed above). When Gateway files its rebuttal testimony, additional items may be declassified at that time.

5. In regard to Staff witness Morrissey's testimony, Gateway does not oppose declassifying that portion of Morrissey's testimony beginning on line 9 of page 3 through the end of her testimony, since this testimony merely contains an overview of federal and state jurisdiction which was not obtained from Gateway.

Respectfully submitted,



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PIPELINE COMPANY, INC.

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing pleading was served by placing same in first-class mail, postage paid, or by hand-delivery, to counsel of record on this 20th day of August, 2001.

