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August 29, 2001

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

FILED³
AUG 29 2001
Missouri Public
Service Commission

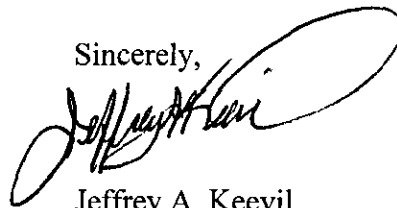
RE: Case No. GM-2001-585

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of a STATEMENT OF GATEWAY PIPELINE COMPANY, INC. WITH RESPECT TO DESIGNATION OF REBUTTAL 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

FILED³

AUG 29 2001

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Joint Application of)
Gateway Pipeline Company, Inc.,) Case No. GM-2001-585
Missouri Gas Company and Missouri)
Pipeline Company.)

**STATEMENT OF GATEWAY PIPELINE COMPANY, INC. WITH RESPECT
TO DESIGNATION OF REBUTTAL TESTIMONY**

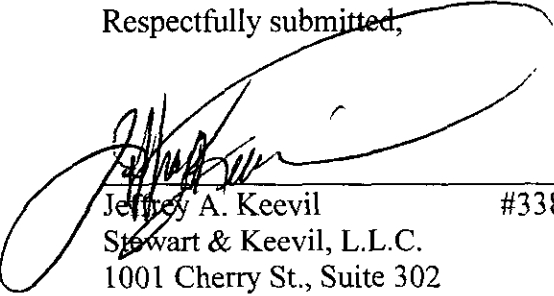
COMES NOW Gateway Pipeline Company, Inc. ("Gateway"), and, pursuant to paragraph I of Attachment A to the Commission's May 2, 2001, Order Granting Protective Order, states as follows:

1. On August 24, 2001, Gateway caused to be filed the prepared rebuttal testimony of David J. Ries and Jeff D. Makholm in this case.
2. Certain portions of Mr. Ries' testimony were designated as "Highly Confidential" or "Proprietary" and filed under seal with the Commission pursuant to the Commission's May 2, 2001, Order Granting Protective Order. Certain portions of Dr. Makholm's testimony were designated as "Highly Confidential" and filed under seal with the Commission pursuant to the Commission's May 2, 2001, Order Granting Protective Order.
3. The designated testimony of Dr. Makholm contains non-public financial information of Gateway, a non-public corporation, which is not available to the general public and which cannot be found in any format in any public document, and terms and other information concerning Gateway's confidential arrangement with its lender (which have been designated by the lender as Confidential)(see, pp. 23-24, 41-42) and also contains information relating to the future business plans and strategies of Gateway, as

well as services which are offered (or may be contemplated) in competition with others. Gateway has made the "Highly Confidential" designation with respect to portions of Mr. Ries' testimony and schedules on the grounds that the testimony and schedules so designated contain information which is not available to the general public and which cannot be found in any format in any public document and which contain projected financial information for Gateway, a non-public corporation, relate to work produced by internal auditors or consultants, and also contain terms and other information concerning Gateway's confidential arrangement with its lender (which have been designated by the lender as Confidential). Gateway has made the "Proprietary" designation with respect to portions of Mr. Ries' testimony on the grounds that such testimony contains information relating to the future business plans and strategies of Gateway, as well as services which are offered (or may be contemplated) in competition with others. Accordingly, the release of the designated testimony would be harmful to Gateway by placing Gateway at a competitive disadvantage in contract negotiations and with its competitors, and could impair Gateway's ability to negotiate for the most favorable financing terms in the future.

WHEREFORE, Gateway invokes the protection of the Commission's Protective Order in this case on the basis aforesaid.

Respectfully submitted,

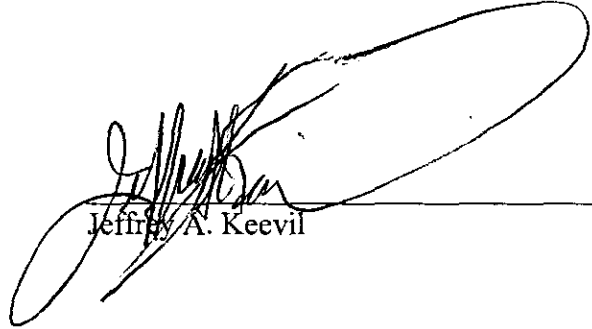


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Attorneys for Gateway Pipeline Company, Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand-delivered on this 29th day of August, 2001, to counsel of record.



Jeffrey A. Keevil