

STEWART & KEEVIL, L.L.C.
ATTORNEYS AT LAW

ORIGINAL

CHARLES BRENT STEWART
JEFFREY A. KEEVIL

1001 CHERRY STREET
SUITE 302
COLUMBIA, MISSOURI 65201-7931

TELEPHONE (573) 499-0635
FACSIMILE (573) 499-0638

August 30, 2001

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

RE: Case No. GM-2001-585

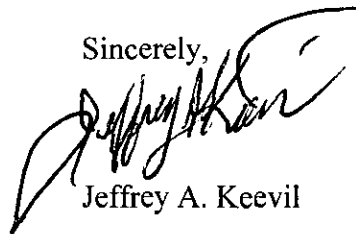
FILED²
AUG 30 2001
Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case are an original and the appropriate number of copies of a REQUEST FOR CLARIFICATION, OR IN THE ALTERNATIVE, APPLICATION FOR REHEARING AND MOTION FOR RECONSIDERATION 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

FILED²

AUG 30 2001

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.)

**REQUEST FOR CLARIFICATION, OR IN THE ALTERNATIVE,
APPLICATION FOR REHEARING AND MOTION FOR RECONSIDERATION**

COMES NOW Gateway Pipeline Company, Inc. ("Gateway"), pursuant to Section 386.500 RSMo and 4 CSR 240-2.160, and for its Request for Clarification, or in the Alternative, Application for Rehearing and Motion for Reconsideration of the Commission's Order Regarding Classification of Responses to Data Requests issued on August 28, 2001, respectfully states as follows:

1. In the Commission's Order Regarding Classification of Responses to Data Requests ("Order") issued on August 28, 2001, which contained an effective date of August 31, 2001, the Commission determined that the response to data request No. 2002 should be classified as Proprietary because it presents financial and business information.

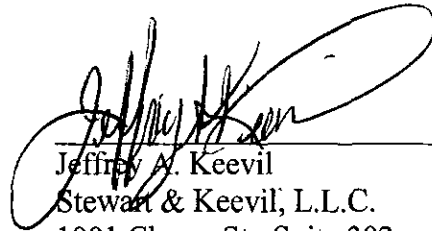
2. In the Order, the Commission determined that the response to data request No. RO12 should be declassified. However, the request itself in RO12 contained information taken from the response to data request No. 2002 which the Commission determined should be classified as Proprietary; in fact, in the Order the Commission deleted the Proprietary information in its recital of data request No. RO12.

3. The Commission should clarify that by declassifying the *response* to data request No. RO12, any information contained in the *request* itself which is taken from the

response to data request No. 2002 remains Proprietary as the Commission found the response to data request No. 2002 to be Proprietary.

4. In the alternative, the Commission should grant rehearing of said Order on the grounds that the Order is unjust, unreasonable, unlawful, arbitrary and capricious, and an abuse of discretion since it is internally inconsistent for the reasons set forth above.

Respectfully submitted,



Jeffrey A. Keevil

#33825

Stewart & Keevil, L.L.C.

1001 Cherry St., Suite 302

Columbia, MO 65201

Telephone (573) 499-0635

Facsimile (573) 499-0638

E-Mail: per594@aol.com

Attorney 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 30th day of August, 2001, to counsel of record.

