LACLEDE GAS COMPANY 720 OLIVE STREET ST. LOUIS, MISSOURI 63101

AREA CODE 314 342-0532

MICHAEL C. PENDERGAST ASSISTANT VICE PRESIDENT ASSOCIATE GENERAL COUNSEL

December 21, 2000

VIA FEDERAL EXPRESS

DEC 2 2 2000

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
P. O. Box 360
Jefferson City, MO 65102-0360

Missouri Public Service Commission

RE: Case No. GT-2001-329 Tariff No. 200100572

Dear Mr. Roberts:

Enclosed for filing, please find the original and eight copies of the Motion for Protective Order in the above-referenced case. Please file-stamp the additional copy of this Motion and return the same in the pre-addressed, stamped envelope provided.

Thank you for your consideration in this matter.

Sincerely,

Michael C. Pendegast

MCP:kz

cc: All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI



Missouri Public Service Commission

in the matter of Laclede Gas Company's Tariff)	
Filing to Implement an Experimental Fixed)	Case No. GT-2001-329
Price Plan and Other Modifications to Its Gas)	Tariff No. 200100572
Supply Incentive Plan.)	

MOTION FOR PROTECTIVE ORDER

COMES NOW Laclede Gas Company ("Laclede" or "Company") and, pursuant to Rules 4 CSR 240-2.080 and 4 CSR 240-2.085 of the Commission's Rules of Practice and Procedure, respectfully requests that the Commission issue its standard Protective Order in the above captioned case. In support thereof, Laclede states as follows:

- 1. On November 17, 2000, Laclede made a tariff filing to implement an experimental fixed price plan and other modifications to its gas supply incentive plan.

 By Order dated December 14, 2000, the Commission suspended the tariff and established an early prehearing conference in accordance with the parties' recommendation.
- 2. Since Laclede submitted its filing, it has received a number of data information requests which seek highly confidential or proprietary material relating to employee or customer-specific matters, commercially-sensitive business functions and activities, particularly in the gas procurement area, and other non-public matters that could detrimentally affect Laclede and its customers if publicly disclosed.
- 3. The Commission has previously recognized in a variety of contexts the need to protect such sensitive information and that the issuance of a protective order will serve to minimize any disputes among the parties and ensure that the Commission and the

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parties receive useful information in an appropriate manner. See e.g. various orders adopting protective order, Case Nos. ER-2001-299, GR-2001-292, TA-2001-289. Laclede believes that the same considerations warrant the issuance of a protective order in this case.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission issue its standard protective order in this proceeding providing for the protection of highly confidential and proprietary information.

Respectfully submitted,

Michael C. Pendergast #31763

Assistant Vice President and

Associate General Counsel

Laclede Gas Company

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CERTIFICATE OF SERVICE

Michael C. Pendergast, Assistant Vice President and Associate General Counsel for Laclede Gas Company, hereby certifies that the foregoing Motion for Protective Order has been duly served upon the General Counsel of the Staff of the Public Service Commission and the Office of the Public Counsel by placing a copy thereof in the United States mail, postage prepaid, on this 21st day of December, 2000.

Milul C. Penchugast