

## Complaint Case Response Form

In the Matter of: Bobby J. Armour v. Laclede Gas Company  
Case No: GC-2008-0004

Listed below are several statements about your case. These statements come from the answer the utility company gave to your complaint and from the investigation done by the PSC staff. After each statement, you must either check the "true" box or give a reason why the statement, or any part of the statement, is not true. If you need more room to respond to a statement than given by the lines on the form, you may attach additional sheets and note the number of the statement you're continuing to respond to. If you do not mark the "true" box and do not give an explanation why the statement is not true, we will assume that you believe the statement is true.

**Laclede Gas Company's Statements.** (These statements are in the same order as Laclede Gas Company's numbered responses in its Answer to the Complaint.)

1. Although Laclede has had some issues with the automated meter reading (AMR) device it put on the meter inside Mr. Armour's home at 2745 Wheaton (the Home) beginning in February 2006, nine of eighteen gas bills that have been issued since February 2006 were based upon actual usage.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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2. The nine actual meter readings obtained by Laclede confirmed that the estimated bills Laclede had issued were generally accurate.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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3. Laclede has not only consistently returned Mr. Armour's phone calls, but has 16 screens of remarks covering communications with Mr. Armour in less than three years.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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4. Mr. Armour's gas usage had become so high over the last five months that Laclede scheduled a high-bill inspection with Mr. Armour at the Home on August 7, 2007, to try and detect the source of the increased usage.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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5. Prior to Mr. Armour's ownership of the Home, gas usage at the Home consistently averaged between 1700 CCF and 2000 CCF per year, which is about double the usage of Laclede's typical customer. Consistent with this trend, Mr. Armour's first two years at the Home, beginning in September 2004, he used just over 1700 CCF per year.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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6. In the past 11 months, Mr. Armour has used over 2300 CCR, or 600 CCF more than normal, including over 200 CCF of use in May 2007, and 82 CCF in June.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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7. The bill Laclede sent to Mr. Armour on June 9, 2006, was based upon actual usage and confirmed the overall accuracy of the usage charged on the estimated May 10, 2007 bill.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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8. The bill Laclede sent to Mr. Armour on February 3, 2007, was based upon actual usage and that actual reading indicated that the estimated bills for service to October 6, 2006 and the bill sent on December 7, 2006, were in line with actual usage.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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9. The bill Laclede sent to Mr. Armour for service to May 10, 2007, was based upon actual usage.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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10. Laclede used the May 10<sup>th</sup> actual usage reading to reconcile estimated bills issued to Mr. Armour in March and April 2007, and that actual usage reading indicated that Laclede had underestimated Mr. Armour's usage in March and April.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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11. Periodic meter readings obtained by Laclede indicate that the Company has been accurately billing Mr. Armour for the gas used.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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12. During the period from February to July of 2007, Mr. Armour has been billed \$1,337 based on actual usage, but has only paid \$700 causing him to fall behind by \$637 during this period alone.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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**Missouri Public Service Commission Staff's Statements.** These statements are from the "FACTS" and "RECOMMENDATION" sections of the Report of the Staff filed on May 16, 2007.)

1. Mr. Armour stated that Laclede sent him a number of estimated bills and that when he asked Laclede to take care of the problem, they refused and would not return his calls.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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2. On February 23, 2006, Laclede installed an AMR device on the existing meter at Mr. Armour's residence with a meter set index of x6860.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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3. After February 23, 2006, meter readings at the Home were based upon AMR readings.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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4. In July 2006, Mr. Armour's account was referred to CellNet to investigate the AMR device set index.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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5. On July 13, 2006, Laclede had billed the account to a meter index of x7293.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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6. On August 9, 2006, Laclede removed the old meter with a meter index of x7331, which verified the AMR meter set index.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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7. On August 9, 2006 a new meter with an AMR device was installed with a meter set index of x 3739.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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8. After the meter change on August 9, 2006, Laclede did not receive any readings from the new AMR and the matter was referred to CellNet to investigate.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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9. Usage between August 9, 2006, and January 10, 2007, were estimated to an estimated meter index of x 4661.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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10. On February 3, 2007, Laclede obtained a meter reading of x4876, which was in line with the previously estimated usage and used that reading for the bill issued on February 13, 2007.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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11. The AMR device was still not providing readings to Laclede, so the March and April 2007 bills were again estimated to an index of x5516.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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12. On April 27, 2007, CellNet went to Mr. Armour's residence and reprogrammed the AMR device thus correcting the data transmission problem.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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13. On April 27, 2007, an actual meter reading of x5713 was obtained.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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14. On May 3, 2007, an informal complaint closure letter was sent to Mr. Armour providing the results of Staff's investigation, advising Mr. Armour that Laclede would be issuing a corrected bill for the additional usage registered on the meter, and advising Mr. Armour to contact Laclede upon receipt of the corrected bill to establish a payment arrangement, if necessary.

☐ This whole statement is true.

This statement is not true because \_\_\_\_\_

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15. On June 16, 2007, Laclede issued a corrected bill for service from February 8, 2007, meter reading index of x4970, to the May 10, 2007, AMR reading index of x5810, for 840 CCFs of actual usage. The charge for gas service was \$1,022.98, and after adjustments for previous bills, payments and late fees for this time frame, the remaining balance on the account was \$1,177.17.

☐ These whole statements are true.

This statement is not true because \_\_\_\_\_

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Thank you for responding to these statements. Please return this form to the PSC by no later than September 13, 2007, so that we can continue to work on your complaint. If you do not return this form, we will assume that you do not want to continue with your complaint and it should be dismissed.