

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED
September 28, 2016
Data Center
Missouri Public
Service Commission

Chantel R. Muhammad)	
Complainant,)	
)	
vs.)	Case No. GC-2016-0010
)	
THE LACLEDE GAS GROUP, INC)	
d/b/a Laclede Gas Company)	
Respondent.)	

COMPLAINANT REPLY BRIEF

Complainant files this brief and in support of it and relief sought:

1. Respondent filed reply brief on September 22, 2016.

2. Respondent claims technicians' access to 730 Dover in October 2008 (and times after) were to handle "safety inspections" and not to install AMR. But, regardless of the nature of the visit(s), Respondent had adequate and ample times (and attempts) to install the AMR (as it did with 732 Dover, Complainant's shared unit neighbor) but failed to do so. Witness, John Lair, also testified to this – saying he did not know why technicians did not install the AMR the time(s) they were there for whatever reason. It should not be incumbent for tenets to be held accountable for mistakes Respondent has made, as well as the obvious lack of and/or poor communication between respective units, etc. within the Respondent's agency.

3. Respondent claims it was "inspecting" the curb box, but what was the reasoning to "inspect" if the intent was not to shut off the service to 730-732 multi-family dwelling? Furthermore, Complainant maintains that not only did Respondent disconnect from the curb on Monday, June 22, 2015 (and it indeed DID), but that Respondent also LIED to the Commission in its report saying it gained access to the unit and shut gas off from the inside on Wednesday, June 24, 2015. These are specious facts that the Commission cannot and should not overlook, if it truly seeks fair and just resolve to this issue and illegal act Respondent (Laclede Gas) committed.

4. In Respondent's brief, it referred to the alleged "damaged curb valve" as a "safety issue". What was the nature of the "safety issue" then, if occupants of the dwelling needed not be informed? Was it REALLY a "safety issue", or (again) is the Respondent attempting to support the lie it told to the Commission in its report that it disconnected service from the inside of the facility rather than from the curb???

5. Complainant is prepared to appeal, file small claims suit and make an open report to media sources and other agencies (such as the Office of the Public Counsel), if the

Commission does not agree that Respondent has indeed performed an illegal act in disconnecting services from the curb to a multi-family dwelling.

WHEREFORE, Complainant (again) requests the following relief:

- Commission finds that Complainant is not responsible for rebilling or “adjusted bill”;
- Commission finds that Laclede violated statute and tariff and committed an illegal act;
- Commission finds that Laclede misled its members in its report;
- Respondent immediately rescinds the adjusted billing (“re-billing”) amount;
- Respondent compensates Complainant for placing the occupants of 730 and 732 Dover in danger and in harm’s way (if in fact valves, equipment, etc. were “defective”. No attempt was made to relocate occupants to safety and/or inform them);
- Respondent compensates Complainant for wrongful disconnection;
- Respondent compensates Complainant for disconnecting at the curb to a multi-tenant dwelling;
- Respondent compensates Complainant for endangering occupants of a multi-tenant dwelling
- Commission rules in favor of Complainant and dismisses any and all Respondent’s claims with prejudice.

Respectfully submitted, executed and sealed by the voluntary act of my own hand, this 28th day of September, 2016.

/s/ Chantel R. Muhammad

Chantel R. Muhammad,

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CERTIFICATE OF SERVICE

I hereby certify that I have served copies of **Complainant Brief** on September 28, 2016 via electronic mail (email) to the following:

RICK ZUCKER, #49211
Associate General Counsel
Laclede Gas Company
700 Market Street, 6th Floor
St. Louis, MO 63101

/s/ Chantel R. Muhammad