

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

Chantel Muhammad,)	
)	
Complainant,)	
)	
v.)	<u>File No. GC-2016-0010</u>
)	
Laclede Gas Company,)	
)	
Respondent)	

**LIST OF ISSUES, LIST OF WITNESSES, ORDER OF CROSS-EXAMINATION
AND STATEMENT OF NON-DISPUTED FACTS**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”) and, after consultation with Laclede Gas Company (“Laclede”), and pursuant to the Commission’s Order Adopting Procedural Schedule in this case, files this list of issues and witnesses, order of cross-examination and statement of non-disputed facts, and in support thereof states as follows:

1. **List of Issues:**

The only issue in this case is whether Complainant is responsible for paying for an adjusted bill rendered by Laclede in 2008.

2. **List of Witnesses:**

For Complainant: Chantel (Sean) Muhammad, _____

For Laclede: John Lair, Supervisor, Meter Reading and Field Collections.

For Staff: Justin Edwards

3. **Order of Cross Examination:**

For Complainant's witnesses: Staff, Laclede

For Laclede's witness: Staff, Complainant

For Staff's witness: Laclede, Complainant

4. **Statement of Non-Disputed Facts**

- A. Complainant has rented a home at 730 Dover (the "Residence") in St. Louis and has been a customer of Laclede Gas at the Residence since 2005.
- B. Laclede sent Complainant bills based on estimated usage from October 2005 to September 2008.
- C. During this period, Laclede sent multiple requests to Complainant to obtain access to the inside meter serving the Residence to obtain a meter reading and install an automated meter reading (AMR) device. However, it was Complainant's position that access to the building should be granted by his landlord, and not by Complainant.
- D. Laclede obtained an actual meter reading at the meter serving the Residence in October 2008. Based on that reading, Laclede concluded that it had underestimated Complainant's gas charges. Laclede issued a bill that covered the 12 month period from October 23, 2007 to October 21, 2008. The rebill included gas used between September 23, 2008 and October 21, 2008 that had not previously been billed.

- E. The bill Laclede rendered for the period October 23, 2007 to October 21, 2008 totaled \$1,608.89. At the same time Laclede credited Complainant's account for the estimated bills previously sent, which covered the period from October 23, 2007 to September 23, 2008. The credits totaled \$393.32. Therefore, the net amount billed was \$1215.57, covering the 11 month rebilled period of October 23, 2007 to September 23, 2008, plus the one unbilled period of September 23, 2008 to October 21, 2008.
- F. Laclede did not rebill the period of November 22, 2005 to October 23, 2007.
- G. Complainant disputed the adjusted bill. On February 17, 2009, Complainant filed an informal complaint with the Missouri Public Service Commission. The informal complaint was not resolved to Complainant's satisfaction. Complainant did not file a formal complaint at that time.
- H. On June 22, 2015, Laclede disconnected gas service to Complainant by turning off gas at the curb.
- I. On July 8, 2015, Complainant filed this formal complaint with the Commission.

The initial draft of this pleading was emailed to the Complainant on April 13, 2016 and a revised version was emailed on April 15, 2016. In both instances, Complainant's feedback was solicited but none was received. Accordingly, this pleading is being filed only on behalf Laclede and Staff.

WHEREFORE, Staff respectfully requests that the Commission accept this list of issues, list of witnesses, order of cross-examination, and statement of non-disputed facts for use in the hearing in this case.

Respectfully Submitted,

/s/ Mark Johnson

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 15th day of April, 2016.

/s/ Mark Johnson