

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

FILED  
August 25, 2015  
Data Center  
Missouri Public  
Service Commission

**Chantel R. Muhammad**

**Complainant,**

vs.

**THE LACLEDE GAS GROUP, INC**

**d/b/a Laclede Gas Company**

**Respondent.**

Case No. **C201501905**  
**GC-2016-0010**

**MOTION TO RECONSIDER**

Chantel R. Muhammad, Complainant, motions the Staff of the Missouri Public Service Commission to reconsider its August 21<sup>st</sup> recommendation and findings; Complainant also requests a pre-hearing conference. In support of the Motion and relief sought, Muhammad states the following:

1. Complainant, Chantel R. Muhammad, is the same person as Sean R. Muhammad;
2. Sean R. Muhammad is not Chantel R. Muhammad's husband;
3. Complainant is a male;
4. Complainant filed Response to Respondent's Answer on 8/21/15;
5. Complainant requests Response be considered with this Motion;
6. Complainant has spoken with Missouri Public Service Commission (MPSC) reps via phone;
7. Complainant has spoken with Respondent reps via phone;
8. Complainant has spoken with Respondent reps in person;
9. Respondent refers to Complainant as "Chantel Sean Muhammad" in utility bills sent via U.S. mail;
10. Respondent has misled the MPSC;
11. Respondent has misinformed the MPSC;
12. Respondent did not file affidavit with its 8/10/15 Motion To Permit Late-Filed Answer;
13. Complainant denies Respondent's claim it disconnected services at 730 Dover on 6/24/15;
14. Respondent disconnected services at 730 Dover on 6/22/15;
15. Complainant denies Respondent's claim it gained access to inside meter and disconnected services;
16. Respondent disconnected services at 730 Dover from the curb on 6/22/15;
17. Respondent disconnected services to a multi-tenant dwelling;
18. 730 Dover is included in the multi-tenant dwelling Respondent disconnected;
19. Disconnection affected family in 732 Dover;

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20. 730 Dover and 732 Dover is the same multi-tenant dwelling;
21. Disconnection of multi-tenant dwelling from the curb endangered every occupant;
22. Complainant denies Respondent's claim it offered payment arrangements to which Complainant never responded;
23. Complainant received funding from several energy assistance agencies to pay bill;
24. Complainant received funding from several energy assistance agencies beginning 6/22/09 (*see attached*);
25. Complainant believes a complete record will show all payments made to pay adjusted bill;
26. Complainant believes adjusted bill is owned by a previous tenant;
27. Complainant believes adjusted bill is carry-over from another's account;
28. Complainant does believe debt (or portions of it) has been paid off by a 3<sup>rd</sup> party;
29. Complainant does believe debt (or portions of it) has been sold to a 3<sup>rd</sup> party;
30. Complainant believes Laclede disconnected services only after (legal) paperwork process requesting validation began in March 2015;
31. Respondent's claim it offered a "good faith down payment" lacks sufficient particularity;
32. Complainant requests a FULL billing report from October 2005 to present.

**WHEREFORE, Complainant now requests the following relief:**

- Respondent immediately restores services to 730 Dover residency;
- Respondent validate balance due to 730 Dover by giving Complainant a complete record account from October 2005 to present;
- Respondent validate balance due to 730 Dover by completing the debt collector disclosure statement sent on April 13<sup>th</sup>;
- Respondent validate balance due to 730 Dover by completing the collector's notice sent on May 12<sup>th</sup>;
- Respondent immediately rescinds the adjusted billing ("re-billing") amount;
- Respondent compensates Complainant for being without service since 6/22/15;
- 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.

Respectfully submitted, executed and sealed by the voluntary act of my own hand, this 24<sup>th</sup> day of August, 2015.



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Chantel R. Muhammad,  
In Pro Per  
All Rights Reserved, Without Recourse

**CERTIFICATE OF SERVICE**

I hereby certify that I have served copies of **Motion to Reconsider** on August 24, 2015

via First Class U.S. mail and/or via electronic mail (email) to the following:

**RICK ZUCKER**  
**Assistant General Counsel**  
**Laclede Gas Company**  
**700 Market Street, 6<sup>th</sup> Floor**  
**St. Louis, MO 63101**



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**Chantel R. Muhammad**  
**August 24, 2015**

From: Sean R. Muhammad <smuhammadpd@aol.com>

To: smuhammadpd <smuhammadpd@aol.com>

Subject: Laclede (April 2009 - April 2010)

Date: Wed, Apr 14, 2010 5:42 pm

## Billing & Payment History

Type	Date	Due Date	Amount *	Payment Method	Therms	Account Balance	Budget / Arrangement Balance
Payment	4/6/2010		(\$77.00)	Electronic		\$746.44	\$866.19
Bill	3/26/2010	4/9/2010	\$111.69		84.6	\$823.44	\$943.19
Payment	3/10/2010		(\$125.00)	ECIP Pledge		\$711.75	\$869.15
Bill	2/25/2010	3/9/2010	\$145.37		149.1	\$836.75	\$869.15
Bill	2/9/2010	2/22/2010	\$265.33		61.1	\$691.38	\$785.50
Bill	12/28/2009	1/8/2010	\$203.04		228.7	\$465.16	\$573.51
Payment	12/4/2009		(\$345.00)	Energy Assistance		\$262.12	\$687.51
Bill	11/24/2009	12/7/2009	\$128.33		94.2	\$607.12	\$687.51
Bill	10/23/2009	11/4/2009	\$110.58		75.9	\$478.79	\$461.59
Payment	10/19/2009		(\$671.81)	Electronic		\$381.72	\$229.08
Bill	9/25/2009	10/7/2009	\$39.30		11.1	\$1,040.02	\$900.89
Bill	8/26/2009	9/8/2009	\$27.05		9.1	\$1,000.72	\$671.81
Bill	8/13/2009	8/24/2009	\$26.81		9.1	\$973.67	\$449.81
Payment	8/12/2009		(\$224.00)	Electronic		\$946.86	\$227.81
Bill	7/21/2009	7/31/2009	\$31.32		10.2	\$1,170.86	\$451.81
Payment	6/22/2009		(\$294.22)	Electronic		\$1,139.54	\$226.41
Bill	5/29/2009	6/10/2009	\$48.91		25.5	\$1,433.76	\$520.63
Bill	4/29/2009	5/11/2009	\$146.13		118.4	\$1,384.85	\$294.22

ATTACHMENT FOR GC-2016-0010  
 "MOTION TO RECONSIDER"

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

<b>Chantel R. Muhammad</b>	)		
Complainant,	)		
	)		
vs.	)	Case No.	<b>C201501905</b>
	)		<b>GC-2016-0016</b>
<b>THE LACLEDE GAS GROUP, INC</b>	)		
<b>d/b/a Laclede Gas Company</b>	)		
Respondent.	)		

**AFFIDAVIT IN SUPPORT OF MOTION TO RECONSIDER**

The undersigned, CHANTEL R. MUHAMMAD, hereinafter "Affiant", does solemnly affirm, declare and state as follows:

1. Affiant is competent to state the matters set forth herein;
2. Affiant has first-hand knowledge of the facts stated herein;
3. All the facts herein are true, correct and complete, admissible as evidence and if

called upon as a witness, Affiant will testify to their veracity.

## PLAIN STATEMENT OF FACTS

1. There is no evidence that does not COMES NOW CHANTEL R. MUHAMMAD, hereinafter Complainant, filing specially for the purpose of motioning the Missouri Public Service Commission (MPSC) to reconsider its recommendation and findings, and Affiant believes that no such evidence exists;
2. There is no evidence that the Complainant, based on documentary evidence and discovery, should not be permitted to have its Motion to Reconsider to be taken into consideration and to have a pre-hearing conference without being denied substantive and procedural due process of law and equal protection of law;

3. There is no evidence that complainant did not submit a Response to Respondent's Answer, on or about August 21, 2015 in rebuttal; Affiant believes that no such evidence exists;

4. There is no evidence that the granting of the Complainant's request will in any way prejudice any parties herein; Affiant believes no such evidence exists;

5. There is no evidence that the granting of this request will not conserve valuable public resources, therefore making the denial of the request moot; Affiant believes no such evidence exists.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 24<sup>th</sup> day of August, 2015.

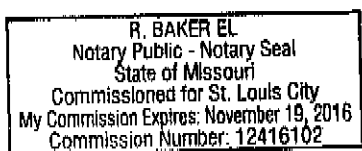


AFFIANT

**JURAT**

State of Missouri ,  
) affirmed and subscribed  
County of St. Louis .

Subscribed and sworn to (or affirmed) before me on this 24<sup>th</sup> day of August, 2015, by Chantel R. Muhammad, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



(Signature of notarial officer)

R Baker El

Printed Name



8/25/2015

From: Chantel Muhammad  
Phone: 314-518-2897  
Fax: 314-679-3323

To: Justin Edwards

Cc: Cydney Mayfield  
Dianna Vaught  
Atty. Eboni Reed  
Atty. Charles Saulsberry  
Atty. Jerryl Christmas  
Elliot Davis – Fox 2 News  
Bonita Cornute – Fox 2 News  
Craig Cheatham  
Milked Colombo – KMOV News  
Chris Kostner, MO Atty. General

Fax: 573-526-1500

7 pages, including cover sheet

**Comments:**

This past Sunday (8/23/15), a Laclede serviceman named "Mike" (vehicle 2049; license plate 2KU459) was out from approximately 10:30am – 12noon, because a strong smell of gas was called in by a neighbor in our area. While using a metal prod to test the curbed area in front of our home that had been dug out by Laclede disconnect services on 6/22/15, he looked up and said, "Wow, this is new!"

Also, please be advised that my payment history to Laclede prior to the adjusted bill ("rebilling") was very consistent, and there were no problems.

Respectfully,

CM

A handwritten signature in black ink, enclosed within an oval-shaped scribble.

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