

**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 BRIEF

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

1. Main issues are:
 - A. Respondent committed unlawful act in rendering "adjusted bill";
 - B. Respondent committed unlawful act in disconnecting Complainant's gas service at the curb, which Respondent said was due to "faulty equipment detected" NOT for non-payment.
2. Respondent and witness (John Lair) testified he did not know why servicemen had not made attempts to correct "defective" meter (for automated readings), even though admitting several service details were performed.
 - A. In December 2005, Respondent DID in fact install new meter to 732 Dover (neighbor and landlord's unit), but did NOT install new meter to 730 Dover (Complainant's unit).
 - B. Respondent mislead and lied to commission in initial report, citing improper dates and reasons for disconnection.
 - C. Respondent admits to having gained access to Complainant's unit AND meter October 2008 but continues to say that even until May 2009 it was not permitted access to Complainant's unit – more lies.
 - D. Respondent reported to commission it gained access to 730 Dover unit on Wednesday, June 24, 2015 to disconnect services, but this is false. Respondent never gained access to the inside unit but in fact DID (unlawfully) disconnect from the curb on Monday, June 22, 2015, though this was against the rules and tariffs (illegal) due to the fact that it would (and it did) also disconnect the landlord/neighbor's service, the unit is a part of a multi-family dwelling and landlord/neighbor's bill was current. This is why Respondent lied and said it gained access to the inside of the facility on a different date.
 - E. Respondent claimed to have "checked" the shut-off valve at the curb and found that it was "defective" but did know how it became "defective". Respondent was only "checking" the valve, because it had every intent to disconnect from the curb, which it so (illegally) did.

- F. Respondent claims to disconnected from the curb due to “safety purposes”, but didn’t think of the safety of the residents enough to alert them that perhaps there was some issue. Even Laclede’s automated voice service and it’s instructions to residents suggests that if there are defections and/or smells of gas pertaining to the services that residents should evacuate, etc. immediately for safety reasons and precautions. Apparently, Laclede was/is more concerned with obtaining bill money than it is for the safety of its customers. So, this “safety issue” Laclede raises is yet another form of deception to complement the illegal act committed by the company and its service people.
3. Laclede violated statute and tariff and lied to commission for cover-up and to tamper with any order, rule or decision proceeding from commission

WHEREFORE, Complainant now 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 19th 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 19, 2016 via electronic mail (email) to the following:

RICK ZUCKER, #49211
Associate General Counsel
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St. Louis, MO 63101

/s/ Chantel R. Muhammad