

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

Doris House,)	
)	
Complainant,)	
v.)	Case No. GC-2007-0451
)	
Laclede Gas Company,)	
Respondent.)	

LACLEDE GAS COMPANY’S ANSWER TO COMPLAINT

COMES NOW Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s June 4, 2007 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Doris House (“Ms. House” or the “Customer”). In support thereof, Laclede states as follows:

1. Ms. House resides on the second floor of 5928 Julian Avenue in St. Louis. She complains of inaccurate billings during 2006, and discriminatory billing of different rates based on billing cycles. Neither of her claims have merit. First, Laclede obtained regular and accurate meter readings at her residence during 2006 and properly billed the customer for the corresponding usage. Second, Laclede does not discriminate in any way, but bills the same tariff rates to all residential customers regardless of billing cycle.

2. With respect to the allegations made in paragraph 2 of Ms. House’s complaint, Laclede denies that it installed a “new computer meter in November 2006.” Instead, Laclede replaced a non-functioning AMR module on its meter at Ms. House’s home on October 19, 2006.

3. Laclede denies that the next month it sent Ms. House a bill indicating that Laclede had underestimated her usage for 12 months. Laclede denies that the new bill

stated a balance of over \$800. In fact, Laclede sent estimated bills to the customer only during the summer of 2006, between the time the first AMR module stopped working and a replacement was installed. These estimates covered very modest summer usage. Following replacement of the AMR module, Laclede sent a bill to the customer for usage to October 24, 2006 of \$85.64. The customer's balance on this date was also \$85.64. In November 2006, Laclede sent a bill for usage to November 24, 2006, of \$211.47. The customer failed to timely pay either of these bills. The customer's balance did not exceed \$800 until she failed to timely pay the bill for the period ended February 27, 2007.

4. Laclede denies that it obtained only eight actual monthly readings for 2006, or that the last meter reading obtained in 2006 was in October. In fact, Laclede obtained 10 actual meter readings in 2006, of which it used nine for billing purposes. Laclede received readings in every month of 2006 except July-September.

5. Laclede is without information or belief to respond to the customer's allegations regarding certain events on October 6, 2006, and on that basis denies the same. Laclede again states that the AMR module replacement was effected on October 19, 2006.

6. Laclede denies that it was negligent in correcting problems with its AMR module. Laclede admits that it estimated three bills in the summer of 2006, but denies that these estimates operated to Ms. House's financial detriment.

7. Laclede asserts that it obtained actual readings in October and November 2006, and that these readings are consistent with the weather experienced during that period.

8. Laclede denies all of the customer's allegations concerning payment of gas rates based on billing cycles. All residential bills are based on Laclede's tariffed residential rates without regard to billing cycle.

9. Laclede denies each and every allegation in the complaint not admitted herein.

10. As of the date of this pleading, Ms. House's past due balance is \$958.37. Since the AMR module change nine months ago, the customer has only made five payments to Laclede, which payments amount to \$857 *less* than the amounts billed to and paid by Ms. House during the same period in the previous year, which was actually warmer than the current year. Under Laclede tariffs and Commission rules, Ms. House can be required to pay \$857 as representative of the amount not in dispute. Laclede requests that, at a minimum, Ms. House make payment arrangements on this amount.

WHEREFORE, Laclede respectfully requests that the Commission accept Laclede's Answer and find that the Company has violated no laws, or rules, decisions, or orders of the Commission in this case.

Respectfully submitted,

/s/ Rick Zucker

Rick Zucker
Assistant General Counsel
Laclede Gas Company
720 Olive Street, Room 1516
St. Louis, MO 63101
(314) 342-0533 Phone
(314) 421-1979 Fax
rzucker@lacledegas.com

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Answer was served on the Complainant, the General Counsel of the Staff of the Missouri Public Service Commission, and the Office of Public Counsel on this 5th day of July, 2007 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch_____