# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Susan Smith,		)
	Complainant,	)
v.		) Case No. GC-2007-0469
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 13, 2007 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Susan Smith ("Ms. Smith" or the "Customer"). In support thereof, Laclede states as follows:

- 1. In her complaint, Ms. Smith alleges that she has been overcharged for gas service at her home on 4056 Taft in St. Louis, and that a meter reading was incorrectly entered. It is difficult to determine the precise basis of her complaint from the facts stated. Nevertheless, Laclede will make its best efforts to provide an answer herein, and will contact Ms. Smith to clarify the nature of her dispute.
- 2. Laclede is without information or belief to respond to the customer's allegations as to whether her furnace has not worked since the first week of January 2007, whether she lives alone, and whether she only uses gas to heat water and cook. Laclede states that its review of Ms. Smith's usage history does show a significant decrease in usage in the past few years.
- 3. Prior to the January 18, 2007 installation of an AMR module on the inside meter at Ms. Smith's home, Laclede had obtained meter readings on a sporadic basis. On

two occasions in the past year, Laclede performed billing adjustments upon receiving actual readings that reconciled overcharges. These overcharges were caused by the fact that the customer's decreased usage pattern had fallen below Laclede's estimating factors.

- 4. Laclede admits that the customer's balance temporarily exceeded \$1300. This occurred due to a faulty self-read of x6563 turned in by the customer on December 18, 2006. On January 5, 2007, Laclede obtained an actual reading of x5611, and on January 18, 2007, Laclede installed the abovementioned AMR module, and obtained a meter reading of x5671. Laclede then issued a billing adjustment for the period August 18, 2006 to January 19, 2007, that provided for total charges over that period of \$451.36. Since the customer had paid only \$150 during this period, the customer's balance on this bill was \$344.17. The customer's next payment for gas service was received by Laclede on April 2, 2007 in the amount of \$100.
- 5. Laclede denies that it obtained a meter reading of x5511. Laclede's reading of x5611 on January 5, 2007, was confirmed by a read of x5671 on January 18.
- 6. Laclede denies each and every allegation in the complaint not admitted herein.

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 18<sup>h</sup> day of July, 2007 by United States mail, hand-delivery, email, or facsimile.

/s/	Gerry	Lynch	