

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

Cesar M. Alba,)	
)	
Complainants,)	
v.)	Case No. GC-2007-0445
)	
Laclede Gas Company,)	
Respondent.)	

LACLEDE GAS COMPANY’S ANSWER

COMES NOW Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s May 24, 2007 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Mr. Cesar Alba. In support thereof, Laclede states as follows:

1. Laclede admits to the allegations contained in paragraph 1 of the Complaint.
2. Regarding paragraph 2 of the Complaint, Laclede answers as set forth below.
3. Laclede admits that Mr. Alba requested gas service from Laclede and that gas service was initiated on October 12, 2006.
4. Laclede admits that its first billing for gas service was in the amount of \$195.63, including taxes and a service initiation charge. Laclede states that this amount was based on an estimate, due to Laclede’s inability to access Mr. Alba’s inside meter.
5. Laclede admits that it obtained an actual meter reading on December 18, 2006, pursuant to a special meter reading. The meter reading indicated that Laclede had

overestimated Mr. Alba's usage, and Laclede subsequently issued a billing adjustment that reflected Mr. Alba's actual consumption.

6. Laclede admits that on December 19, 2006, Mr. Alba reported a gas odor to Laclede. Laclede's service technician identified leaks in the fuel runs in Mr. Alba's home. The service technician also replaced the meter at Mr. Alba's home with an AMR-equipped meter. The service technician left the gas off due to the leaky fuel runs, and referred Mr. Alba to an HVAC contractor for repairs.

7. Laclede is without sufficient information to admit or deny Mr. Alba's allegations with respect to the work of the HVAC contractor hired by Mr. Alba, and therefore denies these allegations.

8. Laclede admits that it rendered a billing to Mr. Alba for the period January 2 to January 31, 2007, based on an actual reading obtained from the AMR module. Laclede denies that the bill for this period was \$516.60. Instead, this bill, which is included as Appendix 5 to Mr. Alba's complaint, reflects a charge for this period of \$291.01, including taxes, and a total account balance of \$500.73, which includes a prior arrearage of \$209.72.

9. Laclede admits that Mr. Alba's gas usage was significantly less at his previous address, 7050 Dartmouth Avenue. However, there are a host of reasons why this might be the case. Laclede notes that Mr. Alba's usage in the 8 months he has lived in his home on Minnesota is consistent with the usage that was previously experienced in this location.

10. Laclede admits that, based on Mr. Alba's concerns, Laclede sent a service technician to perform a high-bill inspection at Mr. Alba's home. Laclede adds that a water heater and furnace are the two major gas appliances that one finds in a home.

11. Laclede admits that it sent Mr. Alba a bill for the period March 2 to April 2, 2007, reflecting current charges of \$70.30, based on usage of 49.4 therms during a period that contained 351 degree days. Laclede states that this bill is consistent with the warmer weather experienced this past March.

12. Laclede denies that its service technicians failed to diligently and effectively test for leaks. Laclede denies that the leaks in Mr. Alba's fuel runs in December 2006 was caused by the subsequently installed AMR module.

13. Laclede denies that it was negligent in any way in performing its regulated duties for Mr. Alba.

WHEREFORE, Laclede respectfully requests that the Commission accept Laclede's Answer and find that the Company did not violate any laws, or rules, decisions, or orders of the Commission.

Respectfully submitted,

/s/ Rick Zucker

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading 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 22nd day of June, 2007 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch_____