FILED
October 24, 2007
Data Center
Missouri Public
Service Commission

OF THE STATE OF MISSOURI

Name:	Cesar M. Alba Complainant)	
vs.)	Case No. GC-2007-0445
Company Name	Laclede Gas Co. Respondent)))	

MOTION TO PRODUCE

Here comes Cesar M. Alba, Complainant, on his behalf, filing a Motion to Produce from the Respondent, Laclede Gas Co. on all records of gas service, meter reading, gas bills, collection letters and gas utility records on the four unit apartment owned by the complainant at 3931-3933 Minnesota Ave, St. Louis, Mo. 63118 since October 3, 1996 to present. This apartment building has four units and each has one bedroom and one bath are as follows: 3931 Minnesota Ave. 1st FI, 3931 A. Minnesota, 2nd FI, 3933 Minnesota Ave, 1st FI and 3933 A. Minnesota, 2nd FI. The complainant is residing in 3931 A. Minnesota Ave., 2nd fI since May 2006.

WHERFORE, all the records that will be presented by the Respondent will be used as exhibits at the evidentiary hearings scheduled on November 7, 2007. The Complainant has enough reason to believe that the two second floor apartments have previous history of the gas service being connected and disconnected due to unusual high gas bills, the same reason that the Complainant is filing this petition. The reproduction of all the records that will be produced as stated in the first paragraph should determine the facts surrounding this case. These records to be presented will provide clear evidence if Laclede Gas has been misleading the past and present customers into believing that there is not enough reason that such unusual high meter reading are not due to gas line leakages but due to other reasons, those records to be produced by the Respondent should be sufficient evidence for the Honorable Judge to render his decision to a satisfactory and fair conclusion.

October 22, 2007

<u>Cesar M. Alba</u> Signature of Complainant

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