

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

Timothy M. Woodbury,	)	
	)	
v.	)	Case No. GC-2007-0198
	)	
Laclede Gas Company	)	
	)	
Respondent.	)	

**LACLEDE GAS COMPANY’S ANSWER TO COMPLAINT**

**COMES NOW** Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s November 27, 2006 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Timothy M. Woodbury (“Mr. Woodbury” or the “Customer”) on that date. In support of its Answer, Laclede states as follows:

1. In his complaint, Mr. Woodbury states that he should not be expected to pay \$600 of extra money because Laclede’s meter is not working properly. In fact, a bill issued to Mr. Woodbury in March 2006 reflected a balance owed of \$638.51, but included an adjustment of less than \$220. The remainder of the bill was for current service rendered.

2. The billing adjustment issued to Mr. Woodbury in March 2006 covered a 12-month period, from March 1, 2005 to March 1, 2006. This adjustment is consistent with the Stipulation and Agreement approved for the Company in Case No. GC-2006-0318. The adjusted bill was required as a result of the failure of a remote meter reading device at Mr. Woodbury’s home. Laclede sent Mr. Woodbury a notice in September 2005 seeking access to read the meter. Laclede obtained a meter reading on February 24, 2006, when an AMR module was installed on the meter at the Woodbury home.

3. As stated above, the adjusted bill issued to Mr. Woodbury in March 2006 reflected an account balance of \$638.51. This amount was comprised of \$180.65 unpaid from the previous bill for the period ended January 30, 2006, plus an amount estimated to be approximately \$245 for gas service rendered from January 30 to March 1, 2006. The remainder, totaling about \$213, represents the actual “catch-up” amount for undercharges covered by the above stated 12 month period.

4. Laclede will afford Mr. Woodbury the benefits of the abovementioned Stipulation and Agreement by also offering him the opportunity to spread payment of the \$638.51 balance over 12 months.

5. It should be noted that Mr. Woodbury’s undisputed balance has continued to rise, owing to payments not made on gas bills issued to him in May, June, August and October of 2006. While Mr. Woodbury is required to pay undisputed gas charges, he may wish to take advantage of the Cold Weather Rule to defer some of these charges. Laclede has spoken to the customer and is working with him to resolve the undisputed billings.

WHEREFORE, in light of the foregoing, Laclede respectfully requests that the Commission accept Laclede’s answer to the complaint.

Respectfully submitted,

**/s/ Rick Zucker**

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**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing Answer was served on the Complainant, on the General Counsel of the Staff of the Missouri Public Service Commission, and on the Office of the Public Counsel, on this 28th day of December, 2006 by hand-delivery, email, facsimile or by placing a copy of such Answer postage prepaid, in the United States mail.

**/s/ Rick Zucker**\_\_\_\_\_