

FILED

APR 20 2007

**DIRECT TESTIMONY
OF
LYNNE SHEWMAKER**

Lynne Shewmaker v. Laclede Gas Company

**Missouri Public
Service Commission**

Case No. GC-2006-0549

Introduction and Summary

Q. PLEASE STATE YOUR NAME AND ADDRESS:

A. Lynne Shewmaker, 7330 Maple Avenue, Maplewood, Missouri 63143

Q. HAVE YOU TESTIFIED PREVIOUSLY IN THIS CASE?

A. No.

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. To show that Laclede Gas Company's current meter and/or the 1st & 2nd AMR readers installed in our house in July 2005 and February 2006 do not accurately reflect the energy use at our house; that I should not have to pay for the overcharges; that all late fees be removed; that the meter be removed and tested by an independent company; and that the AMR be removed.

Q. WHAT EVIDENCE ARE WE PRODUCING?

A. Energy use at a particular residence is unique. It is determined by numerous factors, including materials used in the construction of the dwelling, insulation, windows, window treatments, energy use habits of its occupants, among others. This unique relationship can be described by plotting Heating Degree Days (a measure of air temperature) versus Energy Use (gas consumption indicated by hundred cubic feet or therms). Statistically, this data can be analyzed using regression analysis. We have produced a plot of the use at our residence for 1997 to the present (Exhibit A). An excellent relationship is indicated in this graph up until the installation of the first AMR reader in the summer of 2005. This is indicated by data points which cluster closely about the regression line. The data after the

summer of 2005 is highly scattered. Since there were no changes at our residence to increase energy use after that date, we contend that the instrumentation (2 AMR readers and/or 1 meter) are faulty and do not accurately reflect our energy use. In fact our energy use should have declined during this period, since two teenagers have left the household. We have closed off rooms and reduced the thermostat to 63 degrees. Yet we are still receiving billings for usage significantly higher than that of the period from 1997 to 2005.

We believe that we are one of the 1% of households in St. Louis (650,000 customers in St. Louis - 1% = 6,500!) who have received faulty and/or miscalibrated readers.

Q. WHAT IS OUR PROPOSAL FOR A SOLUTION TO THE ABOVE PROBLEM?

- A. OVERCHARGES.** Based upon our analysis, we do not think that we should have to pay the overcharges for these invalid readings all of which fall above the well-defined relationship between these two variables indicated for the period prior to the installation of the readers and meter. Since the first AMR reader was installed in the summer of 2005, we have been billed \$3,694.00 and have paid \$2,889.00. We believe we have been overcharged \$1,256.00 since 2005. We believe we should be reimbursed \$451.00 to settle with the Respondent (Exhibit B).

LATE FEES. We request that all these fees be removed from our billing.

METER. We request that the meter now at our house be tested by an independent company.

AUTOMATIC METER READER. We request that the automatic meter reader be removed. We will gladly phone or mail in monthly meter readings to the Respondent as we have done over many years.

EXHIBIT A

Case No. GC-2006-0549: Lynne Shewmaker, Complainant v. Laclede Gas Company, Respondent

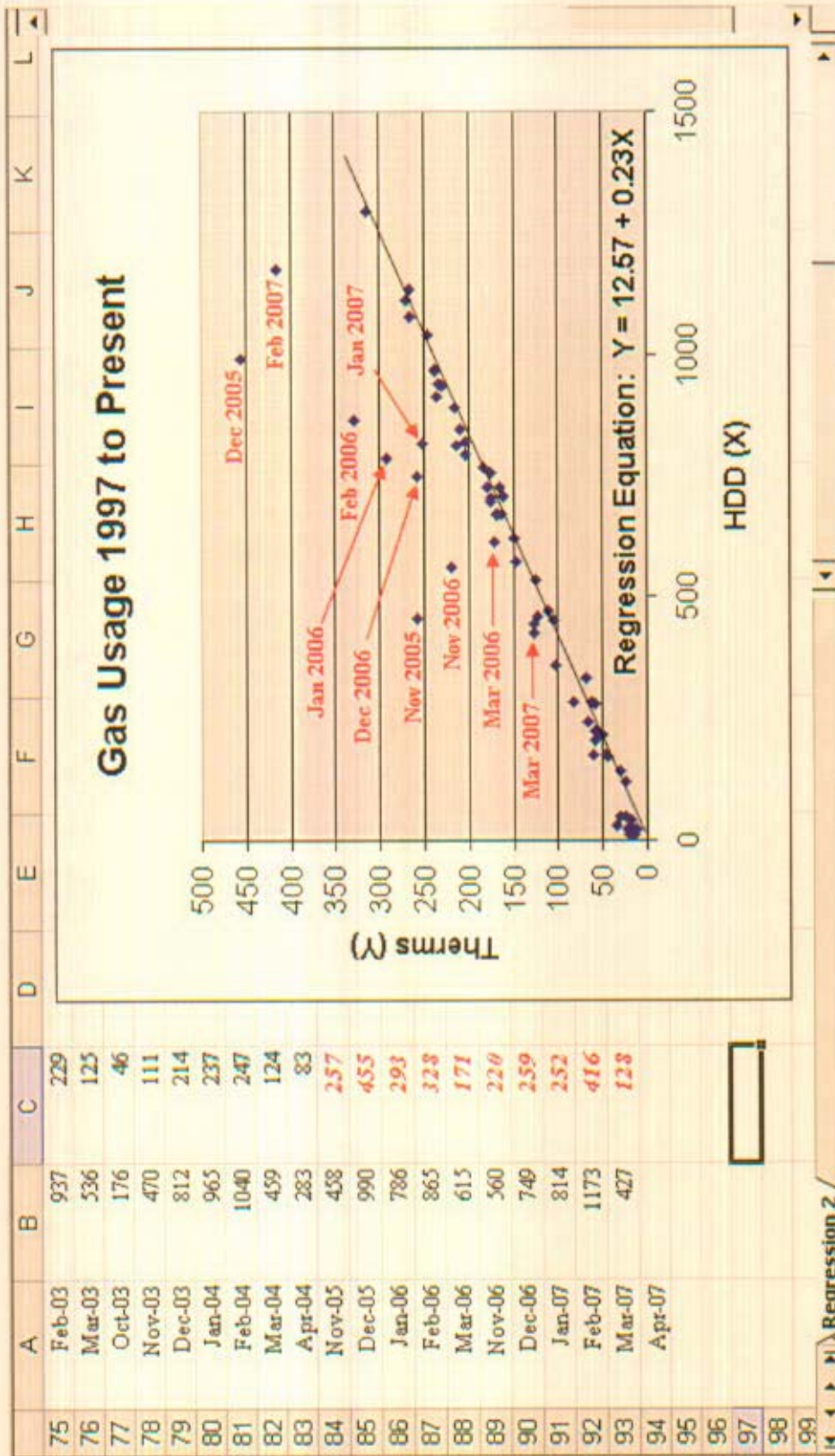
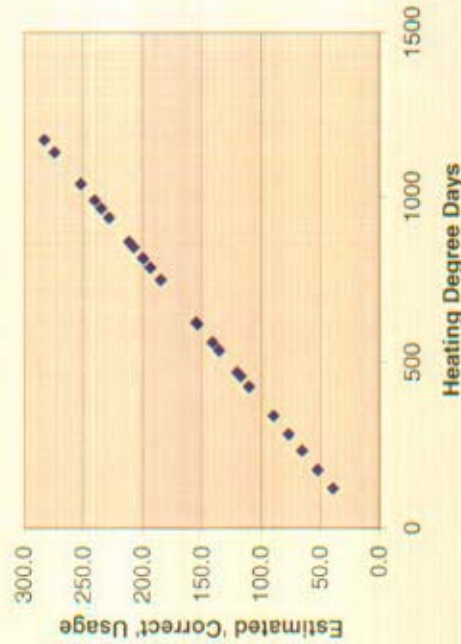


EXHIBIT B -- CORRECT USAGE/CHARGES BASED ON REGRESSION EQUATION

Month	HDD	Therms	HDD	Therms (Y)
Apr-02	234	57.4	234	65.7
May-02	120	24.5	120	39.3
Oct-02	338	48.8	338	89.8
Nov-02	620	148.8	620	155.1
Dec-02	847	209.1	847	207.6
Jan-03	1135	265.7	1135	274.3
Feb-03	937	229.4	937	228.4
Mar-03	536	125.4	536	135.6
Oct-03	176	46.1	176	52.3
Nov-03	470	111	470	120.3
Dec-03	812	214.2	812	199.5
Jan-04	965	237.2	965	234.9
Feb-04	1040	246.9	1040	252.3
Mar-04	459	123.7	459	117.8
Apr-04	283	82.5	283	77.0
Nov-05	458	257.3	458	117.6
Dec-05	990	454.8	990	240.7
Jan-06	786	293.1	786	193.5
Feb-06	865	327.8	865	211.8
Mar-06	615	170.8	615	153.9
Nov-06	560	219.8	560	141.2
Dec-06	749	259	749	184.9
Jan-07	814	252	814	200.0
Feb-07	1173	416	1173	283.1
Mar-07	427	128	427	110.4
Apr-07				

REGRESSION EQUATION
Y = 12.57 + 0.23 X

Estimated 'Correct' Usage based on
Regression Equation



Month	Billing Mo.	HDD	Incorrect Therms	HDD	Correct Therms (Y)	Incorrectly Billed	Correct Charge	Overcharge	Payments	Net Due
Nov-05	Dec-05	458	257.3	458	117.6	\$ 310	\$ 142	\$ 168	\$ 310	\$ (168)
Dec-05	Jan-06	990	454.8	990	240.7	\$ 660	\$ 349	\$ 311	\$ 330	\$ 19
Jan-06	Feb-06	786	293.1	786	193.5	\$ 420	\$ 277	\$ 143	\$ 210	\$ 67
Feb-06	Mar-06	865	327.8	865	211.8	\$ 448	\$ 289	\$ 159	\$ 225	\$ 64
Mar-06	Apr-06	615	170.8	615	153.9	\$ 241	\$ 217	\$ 24	\$ 199	\$ 18
Nov-06	Nov-06	560	219.8	560	141.2	\$ 299	\$ 192	\$ 107	\$ 299	\$ (107)
Dec-06	Dec-06	749	259	749	184.9	\$ 328	\$ 234	\$ 94	\$ 328	\$ (94)
Jan-07	Jan-07	814	252	814	200.0	\$ 314	\$ 249	\$ 65	\$ 314	\$ (65)
Feb-07	Feb-07	1173	416	1173	283.1	\$ 507	\$ 345	\$ 162	\$ 507	\$ (162)
Mar-07	Mar-07	427	128	427	110.4	\$ 167	\$ 144	\$ 23	\$ 167	\$ (23)
TOTALS						\$ 3,694	\$ 2,438	\$ 1,256	\$ 2,889	\$ (451)

LEGEND
Correct Estimated Usage -- 1034
Incorrect Post-Reader Usage -- 990

Amount Claimant is asking to
be reimbursed for by
Respondent.

NOTE: "Net Due" is computed by subtracting "Payments" from "Correct Charge".

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

APR 20 2007

Missouri Public
Service Commission

Lynne Shewmaker)
)
Complainant,)
)
v.) Case No. GC-2006-0549
)
Laclede Gas Company)
)
Respondent.)

AFFIDAVIT OF LYNNE SHEWMAKER

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Lynne Shewmaker, of lawful age, and being first duly sworn, depose and state:

1. My name is Lynne Shewmaker. I am a resident of St. Louis County, Missouri and a customer of Laclede Gas Company.
2. Attached hereto and made a part hereof for all purposes is my direct testimony consisting of pages 1 through 2.
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Lynne P. Shewmaker
Lynne Shewmaker

Subscribed and sworn to me this 17th day of April, 2007.


Joan C. Bennett

My Commission expires _____

JOAN C. BENNETT
Notary Public - Notary Seal
STATE OF MISSOURI
St. Charles County
My Commission Expires May 25, 2007

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been mailed to all counsel of record this 17th day of April, 2007.



Lynne P. Shewmaker