

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

Teresita Fujii)	
)	
Complainant,)	
v.)	Case No. GC-2008-0053
)	
Laclede Gas Company,)	
Respondent.)	

LACLEDE GAS COMPANY’S ANSWER TO COMPLAINT

COMES NOW Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s August 29, 2007 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Teresita Fujii (“Ms. Fujii” or the “Customer”). In support thereof, Laclede states as follows:

1. Ms. Fujii believes she has been overcharged for natural gas service at 6363 Waterman Avenue in University City, Missouri (the “Home”) between November 2006 and March 2007. She and her husband, George, bought the Home in August 2006. The Home is a large brick structure, with two stories plus a finished attic and a basement. It has five bedrooms, two bathrooms, and 3,610 square feet of total living area. Gas appliances at the home include a cooktop, a 53,000 Btu water heater, and a sizeable 300,000 Btu boiler for space heating. Historically, the Home has consistently used about 1900 CCF (Hundred Cubic Feet) per year, which is more than twice the amount used by the typical Laclede customer.

2. In paragraph 2 of her complaint, Ms. Fujii states that Laclede erroneously overbilled her in the amount of \$2,069.21, which represents the total billings for gas service for the entire period complained of, being November 17, 2006 – March 22, 2007 (the “Disputed Period”). All of Laclede’s billings for the Disputed Period were based on

actual meter readings from a meter that was subsequently removed and passed an accuracy test. Further, these readings are not out of line for a property like the Home. Therefore, Laclede denies that it has overbilled Ms. Fujii for gas service rendered during the Disputed Period.

3. Laclede admits that the Fujiis purchased the Home in August 2006, and initiated gas service there on August 16, 2006.

4. Laclede is without information or belief to respond to the customer's allegations as follows, and on that basis denies them:

- A. Whether the Home has been vacant at all times since August 16, 2006;
- B. Whether the Home is being or has been renovated;
- C. Whether the only gas appliance in use has been the gas boiler;
- D. Whether electric heat pumps were installed in November 2006;
- E. Whether electric heat pumps are used to heat the home in autumn.
- F. Whether the gas boiler heat system was not turned on until late November in 2006;
- G. Whether Complainant has been at the house on a daily basis during the Disputed Period; and
- H. Whether there was a power outage at the Home from December 1-7, 2006, and whether the boiler was not operating during that time.

5. Laclede admits that the customer contacted Laclede on November 22, 2006 to complain about the bill issued for the period ended November 17, 2006, in the amount of \$133.45. In response, Laclede scheduled and performed a special meter

reading on November 27, 2006. The special meter reading confirmed the readings being delivered to Laclede by its automated meter reading module (AMR). Laclede admits that, at the time of the special meter read, the Home appeared to be vacant.

6. Following the November 27, 2006 meter reading, the customer continued to complain that her bills were unreasonably high, and Laclede scheduled and performed a high-bill inspection on January 3, 2007. The high-bill inspection revealed nothing special about the Home other than the size of the boiler and the fact that the windows are single pane.

7. Laclede denies that the thermostat was set at 58 degrees during the entire Disputed Period except for two weeks in December. Laclede's records show that, when its service representative arrived to perform the high bill inspection at 9:05 a.m. on January 3, 2007, the thermostat was set on 68 degrees, and the room temperature was also 68 degrees.

8. Laclede denies that, beginning in October 2006, it issued unreasonably high bills.

9. Laclede denies that it cancelled five appointments to change its meter during the Disputed Period. In fact, both Complainant and the Company rescheduled meter change appointments. The total delay in changing the meter was less than two months, as the meter change was first scheduled for January 23, 2007, and the meter was actually changed on March 14, 2007. Moreover, no harm could have occurred from any delay in changing the meter since the meter was tested for accuracy after removal.

10. Laclede admits that it changed the meter at the Home on March 14, 2007. Laclede admits that it replaced the meter at the Home with a larger capacity meter, due to

the demands made by the Home's gas appliances. Laclede admits that it identified and addressed a gas leak in the street outside the Home. Since this leak occurred upstream of the meter, it had no bearing on gas usage registered by the meter.

11. Laclede admits that the customer requested that the replaced meter be tested for accuracy, that such test was performed, and that the meter tested within the accuracy standards set forth by the Commission.

12. Laclede admits that it rendered bills for usage and charges as set forth in the complaint.

13. Laclede admits that the customer has now paid at least half of the total charges assessed for the Disputed Period. Laclede has noted in its customer information system that this account is in dispute and is not to be disconnected for disputed balances.

14. 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

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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, the General Counsel of the Staff of the Missouri Public Service Commission, and the Office of Public Counsel on this 1st day of October, 2007 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch_____