

FILED
November 27, 2007
Data Center
Missouri Public
Service Commission

Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

To Whom It May Concern:

Here is my Complaint Case Response Form regarding Case Number GC-2008-0045.

I retyped the form so I could include my answers directly after the statements. Please also find the attached Appendices. If these need to be copied and distributed, please make sure the Appendices are copied in color the way they are in the original.

I'm looking forward to the opportunity to present my case to the Utility Commission. I have tried to the best of my ability to provide enough information to justify and support my concerns. Please do not hesitate to contact me if you still have questions or concerns that I can address. No one from the Commission staff has contacted me directly to discuss my concerns, so I am anxious for the opportunity to have my case heard.

I would also like to remind the Commission that I travel extensively for work, so I am hoping that the hearing will be set for a time that I am available. My availability is as follows for the next three months:

December 17 – 21, 2007
December 27, 2007
January 14 – 18, 2008
February 11 – 15, 2008
February 18 – 22, 2008

Thank you again for your attention to this case.

Linda Light
3421 NW 67th Street
Kansas City, MO 64151
816.210.4152



Complaint Case Response Form

In the Matter of Linda Light v. Missouri Gas Energy
Case No: GC-2008-0045

*Please see attached
info'*

Listed below are several statements about your case. These statements come from the answer the utility company gave to your complaint and from the investigation done by the PSC staff. After each statement, you must either check the "true" box or give a reason why the statement, or any part of the statement, is not true. If you need more room to respond to a statement than given by the lines on the form, you may attach additional sheets and note the number of the statement you're continuing to respond to. If you do not mark the "true" box and do not give an explanation why the statement is not true, we will assume that you believe the statement is true.

Laclede Gas Company's Statements. (These statements are in the same order as Laclede Gas Company's numbered responses in its Answer to the Complaint.)

1. Missouri Gas Energy (MGE) first installed meters at Ms. Light's address, 3421 NW67th Street, and two adjacent residences in a "three-plex" in October of 2000.

☐ This whole statement is true.

This statement is not true because _____

2. When the meters were installed at Ms. Light's residence and the two adjacent residences, the meter numbers were transposed. Accordingly, although the meters and the lines were properly set, MGE billed Ms. Light and the other two customers for gas used by one of the other residence of the "three-plex".

☐ These whole statements are true.

These statements are not true because _____

3. Ms. Light became a MGE customer on June 2, 2005. Ms. Light contacted MGE because she was concerned about the amount of her bills.

☐ These whole statements are true.

These statements are not true because _____

4. In response to an inquiry by Ms. Light, MGE initiated a service order investigation and confirmed that Ms. Light was being billed for her neighbor's gas usage.

☐ This whole statement is true.

This statement is not true because _____

5. MGE corrected the transposed meter numbers in its computer system to ensure that the three customers, including Ms. Light, would be properly billed.

☐ This whole statement is true.

This statement is not true because _____

6. After an analysis of the billing records and payments, MGE determined that Ms. Light had been over billed by \$105.47.

☐ This whole statement is true.

This statement is not true because _____

7. After the analysis of the billing records and payments, MGE reimbursed Ms. Light \$105.47.

☐ This whole statement is true.

This statement is not true because _____

8. Ms. Light paid \$49.00 for a plumber to independently confirm the meter number. MGE credited her account \$49.00 for this service.

☐ These whole statements are true.

These statements are not true because _____

9. MGE also credited Ms. Light's account \$25.00 for the length of time it took the company to complete the corrected transactions.

☐ This whole statement is true.

This statement is not true because _____

10. When Ms. Light continued to express concern about receiving the proper bill, MGE initiated another service order that was completed on August 31, 2007. MGE verified that Ms. Light's meter went to her residence and matched her bill.

☐ These whole statements are true.

These statements are not true because _____

11. On September 19, 2007, MGE removed Ms. Light's meter. MGE tested Ms. Light's meter on September 21, 2007.

☐ These whole statements are true.

These statements are not true because _____

12. The September 21, 2007 testing of Ms. Light's meter showed that the meter was within the accuracy tolerance required by the Company's General Terms and Conditions and by the Missouri Code of State Regulations.

☐ This whole statement is true.

This statement is not true because _____

13. Ms. Light has been properly reimbursed for overpayment and her bills have been accurate, since the meter numbering error was found and corrected.

☐ These whole statements are true.

These statements are not true because _____

Missouri Public Service Commission Staff's Statements. These statements are from the "FACTS" and "RECOMMENDATION" sections of the Report of the Staff filed on October 26, 2007.)

1. In October 2000, meters were set at 3419 NW 67th Street, 3421 NW 67th Street and 3423 NW 67th Street under the name of Maggie Jones Construction.

☐ This whole statement is true.

This statement is not true because _____

2. Ms. Light initiated service at 3421 NW 67th Street on June 2, 2005.

☐ This whole statement is true.

This statement is not true because _____

3. When the meters for the three units were set, they were installed at the correct premises; however, the service technician reported incorrect meter numbers for the three customers' premises thus MGE billed the three customers incorrectly. Ms. Light's residence, 3421 NW 67th Street, was billed based upon on meter #05612831, but was connected to meter #00636630.

☐ These whole statements are true.

These statements are not true because _____

4. On December 21, 2006, MGE completed a service work order confirming that meter #00636630 went to Ms. Light's address of 3421 NW 67th Street and the meter index was recorded at x3859.

☐ These whole statements are true.

These statements are not true because _____

5. MGE corrected its records to show the correct meter numbers for each residence and the actual usage of each residence based on the correct meter number. The company issued

a spread sheet to Ms. Light showing what she was originally billed and what she should have been billed. The corrections resulted in an overpayment credit of \$105.47 to Ms. Light's account.

☐ These whole statements are true.

These statements are not true because _____

6. On May 14, 2007, Ms. Light told an MGE representative that she still believed her meter was switched with the meter for 3419 NW 67th Street and felt she should have been given as much credit as the customer at 3419 NW 67th Street.

☐ This whole statement is true.

This statement is not true because _____

7. The reason the customer at 3419 NW 67th Street received a larger adjustment than Ms. Light was because that customer had been incorrectly billed for a longer period of time 2001-2006) and had been billed at a commercial rate instead of a residential rate.

☐ These whole statements are true.

These statements are not true because _____

8. MGE credited Ms. Light's account \$49.00 for a December 20, 2006 service call by a licensed plumber who verified that the appropriate meter runs to her residence.

☐ This whole statement is true.

This statement is not true because _____

9. MGE credited Ms. Light's account a courtesy adjustment of \$25.00, due to the length of time it took MGE to complete the corrected transactions.

☐ This whole statement is true.

This statement is not true because _____

10. On July 18, 2007, the Commission's Staff sent Ms. Light a closure letter advising her that the meter registering her usage was being billed to the resident at 3423 NW 67th Street and the meter she was being billed on was for the resident at 3419 NW 67th Street. That letter also advised Ms. Light of the credit issued by MGE to correct the billing on her account and the \$49.00 and \$25.00 additional credits MGE applied to her account.

☐ These whole statements are true.

These statements are not true because _____

11. On August 22, 2007, MGE completed a work order which checked and read the meter at Ms. Light's residence.

☐ This whole statement is true.

This statement is not true because _____

12. On August 31, 2007, MGE completed a service work order which traced the gas lines to Ms. Light's residence with her present at the time of the inspection. That service report indicated that all the lines checked were satisfactory.

☐ These whole statements are true.

These statements are not true because _____

13. Ms. Light's gas appliances consist of a dryer, fireplace logs, furnace, and water heater.

☐ This whole statement is true.

This statement is not true because _____

14. In its August 31, 2007 service work order, MGE's technician noted that there were no problems with Ms. Light's gas.

☐ This whole statement is true.

This statement is not true because _____

15. On September 19, 2007, MGE replaces the meter at Ms. Light's premises, 3421 NW 67th Street. On September 21, 2007, MGE tested the removed meter and the test results show that the meter tested within accuracy Commission standards.

☐ These whole statements are true.

These statements are not true because _____

16. On October 18, 2007, a Commission Gas Safety Staff member made a site visit to Ms. Light's premises, 3421 NW 67th Street, and determined that Ms. Light is being billed on the correct meter following the changes made by MGE in December 2006.

☐ This whole statement is true.

This statement is not true because _____

17. MGE has corrected the problems associated with incorrect meter reading for the customers at 3419, 3421 and 3423 NW 67th Street.

☐ This whole statement is true.

This statement is not true because _____

18. MGE is not rendering correct bills for Ms. Light's premises.

☐ This whole statement is true.

This statement is not true because _____

19. MGE has not violated any Commission rule or its filed tariffs for the billings rendered to Ms. Light.

☐ This whole statement is true.

This statement is not true because _____

Thank you for responding to these statements. Please return this form to the PSC by no later than November 19, 2007, so that we can continue to work on your complaint. If you do not return this form, we will assume that you do not want to continue with your complaint and it should be dismissed.

Laclede Gas Company's Statements

1. Missouri Gas Energy (MGE) first installed meters at Ms. Light's address, 3421 NW 67th Street, and two adjacent residences in a "three-plex" in October of 2000.

X This whole statement is true to the best of my knowledge.

2. When the meters were installed at Ms. Light's residence and the two adjacent residences, the meter numbers were transposed. Accordingly, although the meters and the lines were properly set, MGE billed Ms. Light and the other two customers for gas used by one of the other residence of the three-plex.

X These statements are not true because MGE has not produced any evidence that shows that the switch was not between 3421 and 3419 NW 67th Street. Evidence does show that 3421 was paying for 3419. I was told in November 2006 that the meter I was being billed for at 3421 was #5613831. This is the meter number for 3419. However, no evidence has ever been shown to me that 3423 was paying my bill and that 3419 was paying for 3423. This is what MGE says, but they have never produced any evidence showing this. My usage evidence does not support this. Instead it supports that the meters numbers were mixed up between 3421 and 3419. Please look at the usage rates on the attached spreadsheet (Appendix C). MGE has never explained why the bills originally billed to 3419 were not the bill for 3421. When you compare the usage rates to the other units and ask, "Does this look like a middle unit's usage pattern or an outside unit's usage pattern?" One would expect the middle unit to have a lower usage, given other equal parameters. In addition, there is a distinctive lower usage rate in 2006. This coincides with this being my first winter living at 3421 and traveling extensively so I was not there to use as much gas as the previous owner. When you look at the usage patterns for the other two units during this time, you do not find a similar pattern that shows a dramatic decrease in usage that would be consistent with my moving to 3421 in 2005. I am still waiting for MGE to show proof of a three way switch in meter billing. They were wrong for six years and did not acknowledge the meter mistake until I produced the evidence that showed I was paying for my neighbor's usage. To this day, they have not shown me any evidence that indicates that what was billed to 3419 originally was not my bill, as the usage rates indicate. MGE has also never shown what evidence they have that indicates that what was billed to 3423 originally should be my bill. Just MGE saying so does not make it so. I have asked since last May for MGE to explain and show proof of a three way switch. They have never done so. Why isn't it reasonable to believe that an MGE employee has made another human error in identifying which bills go with which meters and which addresses. How is this entered into a computer? Who sets up the accounts? Does this require human input? If so, then errors could be made -- not intentionally -- but still made.

If no errors were made, then MGE needs to explain how it makes any reasonable sense why my current usage and bill was almost double my neighbors at 3423 since I moved in after they (MGE employees) have supposedly "fixed" the problem (See Appendix A). This also is unexplainable if you look at my travel dates, living situation, middle vs. exterior unit and the total picture. There is nothing in the evidence I have that proves a three way mix up. My evidence shows the mix up was between 3421 and 3419. Now the bills are mixed up between 3421 and 3423.

3. Ms. Light became a MGE customer on June 2, 2005. Ms. Light contacted MGE because she was concerned about the amount of her bills.

X These whole statements are true.

4. In response to an inquiry by Ms. Light, MGE initiated a service order investigation and confirmed that Ms. Light was being billed for her neighbor's gas usage.

X This whole statement is true.

5. MGE corrected the transposed meter numbers in its computer system to ensure that the three customers, including Ms. Light, would be properly billed.

X This statement is not true because, as indicated above, there is no evidence that this was a three way mix up. As indicated here, this correction requires human input. How do we know that an MGE employee did not make an error? MGE has not made any justification that the original bill for 3419 was not supposed to be my bill (3421). MGE has also never justified why the original bill for 3423 was supposed to be my bill. Again, look at the usage rates on the spreadsheet. In addition, MGE needs to justify how with their "fix" that now my usage rate is almost twice that of 3423 (since I moved in June 2005 – Appendix A) when I can prove that I am gone about half the time and my neighbors are there full time (See Appendix B). This does not support proper billing.

6. After an analysis of the billing records and payments, MGE determined that Ms. Light had been over billed by \$105.47.

X MGE determined that I had been over billed \$105.47. However, I do not agree with that assessment. This statement is not true because the credit was based on a three way mix up and there is no evidence of this. The credit needs to be based on my bill being mixed up with 3419 until 2007. Since 2007, I believe I have been billed the amount for 3423.

7. After the analysis of the billing records and payments, MGE reimbursed Ms. Light \$105.47.

X This whole statement is true.

8. Ms. Light paid \$49.00 for a plumber to independently confirm the meter number. MGE credited her account \$49.00 for this service.

X These whole statements are true.

9. MGE also credited Ms. Light's account \$25.00 for the length of time it took the company to complete the corrected transactions.

X This whole statement is true.

10. When Ms. Light continued to express concern about receiving the proper bill, MGE initiated another service order that was completed on August 31, 2007. MGE verified that Ms. Light's meter went to her residence and matched her bill.

X These statements are not true because even though MGE believes that the meter and billing information has been corrected, the evidence does not support this. So, yes, MGE has confirmed that my meter number is the number identified for my residence. However, there is still no justification that the information was corrected properly in the system the way it should have been, which means the bills are still incorrect. Just saying it is so, does not make it so. What proof does MGE have that no human errors have been made in setting up these accounts and bills that could cause this billing problem. So even though the meters may now be correct, they still are not connected with the correct billing information.

11. On September 19, 2007, MGE removed Ms. Light's meter. MGE tested Ms. Light's meter on September 21, 2007.

X These whole statements are true to the best of my knowledge.

12. The September 21, 2007 testing of Ms. Light's meter showed that the meter was within the accuracy tolerance required by the Company's General Terms and Conditions and by the Missouri Code of State Regulations.

X I have no knowledge whether this whole statement is true or not. However, even if it is true, then it only helps to support my case that there has to be a mistake in the bills. Otherwise, how can MGE justify how my utilization rates could be almost double that of 3423 since I moved there in 2005? This is supposedly after MGE has corrected the problem (See Appendix A). How can MGE justify that I could use almost twice as much gas month after month when I am gone two to three weeks per month and my thermostat is turned down to 55 degrees or off when I am gone? When I am home, I keep my thermostat at 70 degrees or lower and take very few showers, wash very few loads of clothes (mostly on the cold wash cycle) and run very few dishwasher cycles.

13. Ms. Light has been properly reimbursed for overpayment and her bills have been accurate, since the meter numbering error was found and corrected.

X These statements are not true because MGE has not justified the three way switch. MGE has also never explained why, if they corrected the problem, that my bill is now so significantly higher than my neighbor at 3423. Just saying that they have corrected the problem does not make it so. Just saying the meter is correct, does not mean that the situation has been corrected. Just saying the meter works does not mean that other human errors were not made in entering information about these accounts into a computer. Just saying that utilization rates can differ among users is not an acceptable justification in this case without any effort given to determine if these rates make sense and apply to the specifics of this case.

MGE has years of experience addressing formal customer complaints. They know the process and the system very well. They also know that it is in their best interest to deny any wrong doing and claim that they have not violated any tariffs or broken any rules. That requires more work for the complainant and the average consumer will give up rather than go through this laborious, difficult, time consuming process. However, I am not going to give up. I want the opportunity to present this case to the Commission. If I could use another gas company for my service, I would have done so long ago. But as long as MGE has a monopoly on gas service in my area, then I am begging the Commission to give me the only chance I have to have an appropriate panel and judge hear this case so that we can get to the explanations needed to rectify this problem. I plead with you all to ask yourself the question, "What would you do if this situation was happening to you and your family?" With gas prices going up dramatically, now more than ever, every consumer deserves proof that his/her bill is correct and that it makes sense based on utilization rates and living patterns in that particular area. That is all I am asking for. Please give me the chance to present my case. Thank you in advance for your serious consideration.

Missouri Public Service Commission Staff's Statements

1. In October 2000, meters were set at 3419 NW 67th Street, 3421 NW 67th Street, and 3423 NW 67th Street under the name of Maggie Jones Construction.

X This whole statement is true to the best of my knowledge.

2. Ms. Light initiated service for 3421 NW 67th Street on June 2, 2005.

X This whole statement is true.

3. When the meters for the three units were set, they were installed at the correct premises; however, the service technician reported incorrect meter numbers for the three customers' premises thus MGE billed the three customers incorrectly. Ms Light's residence, 3421 NW 67th Street, was billed based upon meter #05612831, but was connected to meter #00636630.

X This statement is not true because MGE has never produced any evidence of a three way switch. Yes, I was billed for 3419. However, there is not any evidence that all three customers were billed incorrectly initially. The evidence suggests that the bills were mixed up between 3421 and 3419. There is not any evidence that suggests that there was a mix up with 3423. That mix up has become apparent after MGE supposedly "fixed" the bills. Now, I believe my bill has been mixed up with 3423. It was not that way initially. This is just what MGE claims, however, they have yet to prove where this claim comes from. Just saying so, does not make it so. There were human employee errors setting up the accounts, that were either not corrected or new errors occurred in the process of trying to correct the original problem. I want to ask MGE many questions about their process of analyzing and determining the cause and corrections to the problem, because their solution does not make sense.

4. On December 21, 2006, MGE completed a service work order confirming that meter #00636630 went to Ms. Light's address of 3421 NW 67th Street and the meter index was recorded at x3859.

X These whole statements are true to the best of my knowledge. However, I do not know what the "meter index was recorded at x3859" means.

5. MGE corrected its records to show the correct meter numbers for each residence and the actual usage of each residence based on the correct meter number. The company issued a spread sheet to Ms. Light showing what she was originally billed and what she should have been billed. The corrections resulted in an overpayment credit of \$105.47 to Ms. Light's account.

X These statements are not true because MGE has never shown evidence of a three way switch in the meters and billings. MGE has never explained how the billing rates for these three units could possibly be justified by the utilization rates of the three units involved. Please carefully examine the attached spreadsheets showing the utilization rates from 2000 – 2006 (Appendix C). The \$105.47 credit was based on MGE saying that my original bill should be what was billed to 3423 NW 67th Street. However, when I questioned MGE on why they thought it was a three way mix up vs. my bill being mixed up with 3419 and they never got back to me or justified this with any kind of objective data. It was just because they "said so".

6. On May 14, 2007, Ms. Light told an MGE representative that she still believed her meter was switched with the meter for 3419 NW 67th Street and felt she should have been given as much credit as the customer at 3419 NW 67th Street.

X This statement is not true because I never told anyone that I should have been given as much credit as the customer at 3419. What I did say was that I thought my bill was switched with 3419 and that I wanted the credit given based on that switch, which was not what MGE presented in their spreadsheet. What I told the representative was that I would go home and compare the MGE information with my bills from 3421 and from 3419. If they matched, I thought the problem was resolved. However, they did not match, so I called the MGE representative again. When she called me back the following week, she said that the reason they did not match was because MGE said my corrected bill was being based on the utilization at 3423. When I asked her what evidence MGE had for this mix up, she said she would get back to me. I have never received a response regarding this question.

7. The reason the customer at 3419 NW 67th Street received a larger adjustment than Ms. Light was because that customer had been incorrectly billed for a longer period of time (2001-2006) and had been billed at a commercial rate instead of a residential rate.

X This statement may be true; however, it does not explain pertinent pieces of information regarding this case. Yes, this neighbor has lived in her residence for a longer period and therefore deserves a larger adjustment based on the difference in time living there. Yes, according to MGE, 3419 was billed at a commercial rate instead of a residential rate. However, if it was my bill at 3421 that was mixed up with the bill at 3419, then I should have received the adjustment for the commercial rate, not my neighbor at 3423. That is the point I was trying to make in my formal complaint about why I should receive credit for the commercial rate.

8. MGE credited Ms. Light's account \$49.00 for a December 20, 2006 service call by a licensed plumber who verified that the appropriate meter runs to her residence.

X This whole statement is true.

9. MGE credited Ms. Light's account a courtesy adjustment of \$25.00, due to the length of time it took MGE to complete the corrected transactions.

X This whole statement is true.

10. On July 18, 2007, the Commission Staff sent Ms. Light a closure letter advising her that the meter registering her usage was being billed to the resident at 3423 NW 67th Street and the meter she was being billed on was for the resident at 3419 NW 67th Street. The letter also advised Ms. Light of the credit issued by

MGE to correct the billing on her account and the \$49.00 and \$25.00 additional credits MGE applied to her account.

X This whole statement is true. This is after I had contacted the Commission Staff person about not responding to my complaint in the timeframe promised (I waited over 6 weeks for a response). Shortly after, I received her response which basically agreed with MGE's explanation of this case. Then I called and questioned the Commission Staff person who wrote the letter and asked her why she had never interviewed me, or followed up with me to allow me to give input to this case. She only talked with MGE. She said if I was unhappy with the informal complaint, I could submit a formal complaint, which I did.

11. On August 22, 2007, MGE completed a work order which checked and read the meter at Ms. Light's residence.

X This whole statement is true to the best of my knowledge.

12. On August 31, 2007, MGE completed a service work order which traced the gas lines to Ms. Light's residence with her present at the time of the inspection. That service report indicated that all the lines checked were satisfactory.

X These statements may or may not be true. A MGE employee came to my house and checked to see if there were any leaks. He checked the furnace, water heater and fireplace. I have no knowledge of him tracing the gas lines (I am not even sure what that means). So I am not sure whether these checked satisfactory or not.

13. Ms. Light's gas appliances consist of a dryer, fireplace logs, furnace, and water heater.

X This statement is not true because I do not have a gas dryer. I clearly indicated what gas appliances I had in my formal complaint, so it again reinforces that the staff person only listened to what MGE stated about the case and did not make any attempt to contact me or talk with me about my concerns. She did not even double check this against my complaint. The staff member makes a statement in the report that she "is unable to form any conclusions on Ms. Light's comparison of her gas usage with her neighbors' because there are many variables that can affect the amount of gas used some of which could be the number of gas appliances in use, the hot water heater thermostat setting, if the hot water heater has a thermal wrap, the furnace thermostat setting, **how often the gas dryer is used**, how often the fireplace logs are used, etc." Isn't it the Staff person's job to try to find these answers? This person did not even call me, contact me or ask me anything related to this case. If she had, the gas dryer issue would have been addressed. This staff person would then know that if I am gone over half the days of the month and living the way I do, it is impossible for me to use the same

amount of gas as my neighbors at 3423, let alone twice as much as the current bills indicate.

Here are the facts. I am traveling over half the days in a month (see attached travel schedules – Appendix B). When I am gone, my thermostat is set at 55 degrees or off. When I am home, my thermostat is NOT set above 70 degrees. When I am gone, no water gets used, the fireplace is not on (only the pilot light), no clothes get washed, and no dishes are done. Virtually, very little gas is used. When I am home, I do not use my shower or bath every day. I do about one load of laundry a week and that is usually on a cold water cycle. I rarely run my dish washer. In fact, I can show you a bill for an appliance repair for my dish washer because it seized up from “lack of use”.

So, MGE has some explaining to do. If everything has been “fixed” according to MGE, then how does MGE explain why my utilization rate is significantly more than my neighbors at 3423? How do they explain that my utilization rate is almost double that of my neighbors at 3423 since the time that I moved in (See Appendix A)? My neighbors have two adults living there, with somebody home all day. They rarely travel. The staff person spoke to my neighbor about this case. However, the staff person did not ask any questions that would verify gas usage. So, the staff person did not even try to get answers so s/he could make a determination of usage that pertains to the specifics of this case. Instead, the staff person just makes a generic statement about how there can be differences in utilization rates. That generic statement would more likely explain the differences in the bill for 3419 and my current bill (which I believe is the bill for 3423). Both neighbors are home and rarely travel. Their bills are not the same, but they reflect patterns that are consistent with outside units, and similar living patterns. As someone who lives in the middle unit and travels half the time, one would expect my utilization rate to be significantly less (as indicated on the current bills for 3423). That again, is why I believe these bills have been switched.

14. In its August 31, 2007 service work order, MGE’s technician noted that there were no problems with Ms. Light’s gas.

X This whole statement is true to the best of my knowledge.

15. On September 19, 2007, MGE replaces the meter at Ms. Light’s premises, 3421 NW 67th Street. On September 21, 2007, MGE tested the removed meter and the test results show that the meter tested within accuracy Commission standards.

X I have no knowledge whether these statements are true or not. However, I do know that MGE has some explaining to do and cannot have it both ways. If they have done everything right to correct the problem since December 2006, then how can MGE justify correct meter readings and billings for 3421 and 3423 that shows an ongoing utilization rate for 3421 (mine) that is almost double that of 3423 (See

Appendix A)? Again, look at the evidence and explain how I can be gone over half the time (See Appendix B), that I am one adult living in a unit half time, compared with two adults living in a unit full time, that I have an internal unit with limited external exposure compared to an external unit with three sides exposed externally, that when I am home, I use very little hot water and do not use the fireplace – so how does that transfer into a utilization rate that is double that of my neighbors? If the accuracy standards set by the Commission (or whomever) allow for this type of error rate to be allowed (that could show a usage rate double that of my neighbors, given my living situation), then something needs to be done. It is unacceptable to think that my meter could be accurate and clicking away at twice the rate of my neighbors' meter, given the specifics of our living situation and that the conclusion could be that this is OK. That is again, why I believe the error is with the billing and how it has been set up in the computer system.

16. On October 18, 2007, a Commission Gas Safety Staff member made a site visit to Ms. Light's premises, 3421 NW 67th Street, and determined that Ms. Light is being billed on the correct meter following the changes made by MGE in December 2006.

X This whole statement may or may not be true. I cannot confirm this because I never saw or spoke with this staff person. He came on a day (clearly identified on my travel schedule that was included in my formal complaint) that I was not home. He did not make any effort whatsoever, during this entire complaint process to contact me or talk with me. My neighbor at 3423 did indicate that the staff person spoke to her and asked her what she knew about the case. She did not indicate that the staff person asked anything that would help clarify living patterns or utilization rates, which is clearly what this case involves researching. In addition, did this staff person only talked with MGE who is going to present everything they can to show how they have "fixed" the problem. This is a very one-sided approach to researching a complaint. That is why I believe I deserve the chance to present my case to the Commission. Thus far, you have only heard one side. So again, even though my meter may be correct, I have no indication that I am being billed correctly since I moved in. In fact, I have lots of evidence suggesting there is still an ongoing problem.

17. MGE has corrected the problems associated with incorrect meter reading for the customers at 3419, 3421 and 3423 NW 67th Street.

X This statement is not true because if this problem had been corrected then I would not have a higher utilization rate (bill) than my neighbor at 3423. It is not "just a little higher" – it is almost double – according to "corrected" MGE records. Please see the attached spreadsheets. This goes back to my original complaint. I contacted MGE originally because my gas bill was significantly higher than my neighbor's bill at 3419. This did not make any sense to either one of us based on my travel, living situation, internal vs. external unit etc. Now after

MGE supposed "fix" to the problem, I am having the very same problem, just with my other adjoining neighbor. I keep asking – "How can this possibly be correct?" And I have yet to get an acceptable answer. Just saying the meters are correct does not fix the problem. My belief is that the problem is with incorrect information being entered into the computer system identifying the billing as it relates to the meters. This is a result of human errors – not meters. Please, please hear my case, so that the Commission can help me come up with a reasonable determination and solution.

18. MGE is not rendering correct bills to Ms Light's premises.

X This whole statement is true.

19. MGE has not violated any Commission rule or its filed tariffs for the billings rendered to Ms. Light.

X I have no knowledge whether this statement is true or not. I do not believe MGE has intentionally over billed me. We do agree that there were human employee errors made back in 2000 that affected my bill through 2006. That has been acknowledged by both parties. However, where we disagree, is with whether or not this problem has resulted in an appropriate fix. I do not believe MGE is continuing to purposefully violate tariffs or anything else that has caused the inaccurate bills. However, MGE has not proven or ruled out that other human employee errors have not been made in setting up these accounts, computer entries, billing, etc. that would explain how my bill is mixed up with 3423. So even though Commission rules and tariffs may not be violated, that does not mean that errors are not being made related to my utilization rates and bills.

If MGE can prove that no errors have been made, then how can MGE or the Commission justify and say that there is not some problem in the system that would allow a customer to be billed almost double the utilization rate of a neighbor given the specific circumstances of this case? No reasonable explanation can be given for my rate to be twice that of my neighbors at 3423 when anyone considers that we live in attached units (mine is the middle unit of three with very limited external exposure compared to the other two), that I travel and am gone about half the time, that my thermostat is set to 55 degrees or off when I am gone and not above 70 degrees when I am home, that I use very small amounts of hot water for showers and dishes when I am home, I do laundry on the cold cycle most of the time and do about 1 load per week, I am one adult living in my home half the time and two adults live at 3423 full time, with one home all day because he does not work outside the home. All of these facts strongly suggest that there is some ongoing problem with my current gas bill and that this problem has not been "fixed". Please, please, please hear this case, so that the Commission can help me get to the root cause and get this corrected.

Appendix A

Comparison of Current Usage according to MGE's fix to the original meter billing problem

3421 NW 67th	Usage 2005	Usage 2006	Usage 2007
Jan		58	52
Feb		48	81
Mar		36	46
April		23	32
May		18	17
June	17	15	14
July	15	16	16
Aug	14	13	14
Sept	16	14	15
Oct	13	15	13
Nov	16	30	14
Dec	61	42	

3423 NW 67th	Usage 2005	Usage 2006	Usage 2007
Jan	91	30	25
Feb	52	26	42
Mar	29	24	25
April	16	14	21
May	10	10	9
June	8	7	10
July	6	7	8
Aug	7	7	7
Sept	7	6	7
Oct	6	7	9
Nov	11	11	
Dec	40	19	

Appendix B: TRAVEL DATES

2007

JANUARY

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

FEBRUARY

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28			

MARCH

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

APRIL

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30				

MAY

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

JUNE

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

JULY

S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

AUGUST

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

SEPTEMBER

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

OCTOBER

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

NOVEMBER

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	

DECEMBER

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

Legend:



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Travel Dates - Not at home at 3421 NW 67th St

Appendix B: TRAVEL DATES

2006

JANUARY

S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

FEBRUARY

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28				

MARCH

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30	31	

APRIL

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

MAY

S	M	T	W	T	F	S
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

JUNE

S	M	T	W	T	F	S
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	

JULY

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30	31					

AUGUST

S	M	T	W	T	F	S
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

SEPTEMBER

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

OCTOBER

S	M	T	W	T	F	S
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

NOVEMBER

S	M	T	W	T	F	S
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

DECEMBER

S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

Legend:



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Travel Dates - Not at home at 3421 NW 67th St

Appendix B: TRAVEL DATES

2005

JANUARY

S M T W T F S

FEBRUARY

S M T W T F S

MARCH

S M T W T F S

APRIL

S M T W T F S

MAY

S M T W T F S

JUNE

S M T W T F S

			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

JULY

S M T W T F S

					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

AUGUST

S M T W T F S

		1	2	3	4	5	6
7	8	9	10	11	12	13	
14	15	16	17	18	19	20	
21	22	23	24	25	26	27	
28	29	30	31				

SEPTEMBER

S M T W T F S

					1	2	3
4	5	6	7	8	9	10	
11	12	13	14	15	16	17	
18	19	20	21	22	23	24	
25	26	27	28	29	30		

OCTOBER

S M T W T F S

					1	
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23/31	24/31	25	26	27	28	29

NOVEMBER

S M T W T F S

		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

DECEMBER

S M T W T F S

					1	2	3
4	5	6	7	8	9	10	
11	12	13	14	15	16	17	
18	19	20	21	22	23	24	
25	26	27	28	29	30	31	

Legend:



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Travel Dates - Not at home at 3421 NW 67th St

Appendix C

3423 Usage by Years -As billed by MGE through 2006 and with MGE corrections for 2007

	Usage 2001	Usage 2002	Usage 2003	Usage 2004	Usage 2005	Usage 2006	Usage 2007
Jan	114	80	66	97	129	58	25
Feb	75	70	103	116	94	48	42
Mar	79	66	103	91	66	36	25
April	37	42	32	55	48	23	21
May	23	22	24	33	34	18	9
June	18	23	21	24	17	15	10
July	20	20	20	23		16	8
Aug	16	18	21	24	14	13	7
Sept	19	21	22	23	16	14	7
Oct	18	17	23	23	13	15	9
Nov	21	26	30	33	16	30	
Dec	37	62	68	72	61	42	

3423 Usage by Years -As I believe it should have been billed by MGE

	Usage 2001	Usage 2002	Usage 2003	Usage 2004	Usage 2005	Usage 2006	Usage 2007
Jan	114	80	66	97	129	58	52
Feb	75	70	103	116	94	48	81
Mar	79	66	103	91	66	36	46
April	37	42	32	55	48	23	32
May	23	22	24	33	34	18	17
June	18	23	21	24	17	15	14
July	20	20	20	23		16	16
Aug	16	18	21	24	14	13	14
Sept	19	21	22	23	16	14	15
Oct	18	17	23	23	13	15	13
Nov	21	26	30	33	16	30	14
Dec	37	62	68	72	61	42	

Appendix C

3421 Usage by Years - As billed by MGE through 2006 and with MGE corrections for 2007

Usage 2001	Usage 2002	Usage 2003	Usage 2004	Usage 2005	Usage 2006	Usage 2007
138	83	76	76	105	64	52
94	77	109	100	79	62	81
79	74	106	71	52	53	46
44	46	39	40	32	37	32
25	20	26	24	23	21	17
20	21	21	19	17	17	14
17	16	18	20	17	18	16
15	17	16	17	17	16	14
17	18	18	19	15	15	15
16	16	18	20	17	18	13
20	35	21	30	20	26	14
39	76	47	57	69	56	

3421 Usage by Years - As I believe it should have been billed by MGE

Usage 2001	Usage 2002	Usage 2003	Usage 2004	Usage 2005	Usage 2006	Usage 2007
159	63	52	53	91	30	25
87	57	82	89	52	26	42
83	47	86	55	29	24	25
26	29	16	16	16	14	21
10	9	12	12	10	10	9
10	8	8	9	8	7	10
7	6	6	9	6	7	8
7	6	7	9	7	7	7
7	7	7	7	7	6	7
10	8	7	8	6	7	9
15	13	7	13	11	11	
21	41	23	35	40	19	

Appendix C

3419 Usage by Years - As billed by MGE through 2006 and with MGE corrections for 2007

Usage 2001	Usage 2002	Usage 2003	Usage 2004	Usage 2005	Usage 2006	Usage 2007
159	63	52	53	91	30	33
87	57	82	89	52	26	101
83	47	86	55	29	24	56
26	29	16	16	16	14	40
10	9	12	12	10	10	19
10	8	8	9	8	7	
7	6	6	9	6	7	
7	6	7	9	7	7	
7	7	7	7	7	6	
10	8	7	8	6	7	
15	13	7	13	11	11	
21	41	23	35	40	19	

3419 Usage by Years - As I believe it should have been billed billed by MGE

Usage 2001	Usage 2002	Usage 2003	Usage 2004	Usage 2005	Usage 2006	Usage 2007
138	83	76	76	105	64	33
94	77	109	100	79	62	101
79	74	106	71	52	53	56
44	46	39	40	32	37	40
25	20	26	24	23	21	19
20	21	21	19	17	17	
17	16	18	20	17	18	
15	17	16	17	17	16	
17	18	18	19	15	15	
16	16	18	20	17	18	
20	35	21	30	20	26	
39	76	47	57	69	56	

Appendix C

Usage as Billed for last 3 years

	2005 3423 NW 67th	3421 NW 67th	3419 NW 67th
Jan	129	105	91
Feb	94	79	52
Mar	66	52	29
April	48	32	16
May	34	23	10
June	17	17	8
July		17	6
Aug	14	17	7
Sept	16	15	7
Oct	13	17	6
Nov	16	20	11
Dec	61	69	40

Correct Usage - What I believe the Bills Should be Based On

	2005 3423 NW 67th	3421 NW 67th	3419 NW 67th
Jan	129	91	105
Feb	94	52	79
Mar	66	29	52
April	48	16	32
May	34	10	23
June	17	8	17
July		6	17
Aug	14	7	17
Sept	16	7	15
Oct	13	6	17
Nov	16	11	20
Dec	61	40	69

Appendix C

Usage as Billed for last 3 years

2006	3423 NW 67th	3421 NW 67th	3419 NW 67th	2007	3423 NW 67th	3421 NW 67th	3419 NW 67th
	58	64	30		25	52	33
	48	62	26		42	81	101
	36	53	24		25	46	56
	23	37	14		21	32	40
	18	21	10		9	17	19
	15	17	7		10	14	
	16	18	7		8	16	
	13	16	7		7	14	
	14	15	6		7	15	
	15	18	7		9	13	
	30	26	11			14	
	42	56	19				

Correct Usage - What I believe the Bills Should be Based On

2006	3423 NW 67th	3421 NW 67th	3419 NW 67th	2007	3423 NW 67th	3421 NW 67th	3419 NW 67th
	58	30	64		52	25	33
	48	26	62		81	42	101
	36	24	53		46	25	56
	23	14	37		32	21	40
	18	10	21		17	9	19
	15	7	17		14	10	
	16	7	18		16	8	
	13	7	16		14	7	
	14	6	15		15	7	
	15	7	18		13	9	
	30	11	26		14		
	42	19	56				