

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

3. Complainant provided public county records that the Complainant resided at 2629 Terrace Ln. St. Louis, MO.
4. That gas service was obtain by Rosemary Jackson, for 8831 May Ave and 9414 Eastchester Dr. St. Louis, MO.

### **STATEMENT OF COMPLAINANT**

On or October 16, 2006, Laclede Gas Company, disconnected Complainant's gas service for failre to pay for service from other metered locations.

Complainant had file a prior informal complaint against Laclede Gas Co., but was told that I had to file a formal complaint to resolve the matter regarding subsequent charges. I file a formal complaint in February 2007 and requested Laclede Gas Company to reconnect my gas services while the disputed amount Was being resolved by the Commission. Laclede Gas Co. refuse to restore gas to my residence.

### **STATEMENT OF FACTS**

1. That Laclede Gas Company terminated Complainant gas service and refuse To reconnect service while the Commission resolve complain regarding a disputed amount for services for another meter location.
2. That there was a Evidentiary Hearing in November 2007.

### **ARUGMENT**

Federal, State Law, and Regulations exist to be followed, not ignored by Laclede Gas Company. Respondent terminated Complainants gas service for failure to pay for services at another metered location. Complainant filed a formal

complaint against Laclede Gas Company. Complainant requested Respondent to restore services at Complainant residence while the Commission resolved the disputed charges, Respondent refused to restore services. 4CSR 240-13.050(2) (B) (C) (D)(E). prohibits Respondent from disconnecting Complainant's gas services. There are State Laws for violating State regulations that are embodied in RSMO 386.570, and RSMO 476.110(3) Complainant strongly Believes that Respondent violated State Laws and regulations. Rosemary Jackson, who is married to Complainant opened all three gas service accounts at 9414 Eastchester Dr, 8831 May Ave., and 2629 Terrace Ln. St. Louis, MO. Using State Regulation 4CSR 240-13.050, (D) Respondent is claiming that Complainant is responsible for all debt for all three locations, because Complainant received substantial benefit and use of services. Complainant believes that Respondent use of this regulation is capricious and arbitrary Regarding substantial benefit. It's like a "catch all clause" in determining who eventually pays for gas services or collection efforts to collect unpaid gas service accounts.

Examples:

- a. An infirmed relative residing in your residence can be required to pay past due gas bills if customer refuses to pay under the substantial use provision Of the regulation.
- b. Respondent can initiate a collection effort against your children between the ages of 10 and 20 years old for unpaid gas services. There is nothing

in this regulation that hinders the effort, because they received substantial benefit from gas services.

The Complainant believes that Respondent violated the Equal Credit Opportunity Act, 15USC 1691, Section 075(c) (d) (e) (f) and (g). Laclede Gas Company nor the Commission can penalize the Complainant for not paying for account(s) established by another party. If, Rosemary Jackson establish theses accounts in her name Laclede Gas company can not aggregate these charges or debt to the Complainant. Respondent in accordance with 4 CSR 240-2.050 (2) (C (D)(E), had no right to terminate Complainants gas services.

### **CONCLUSION**

For the foregoing reasons Complainant moves the Commission to render an Order and a Judgment against Laclede Gas Company as follows:

- a. vacate any all services charges against Complainant.
- b. to restore gas services to Complainant without penalties or reprisals.
- c. and any other remedy the Commission deems proper.

Respectfully submitted,



Marilyn Young Pro-Se  
P.O. Box 2487  
Florissant, MO 63033  
314.869.0799

**CERTIFICATION OF SERVICE**

I hereby certify the a true copy of the foregoing was sent the U.S. Mail on  
5th December 2007, to:

Rick Zucker  
Legal Dept.  
Laclede Gas Company  
720 Olive Street  
St. Louis, MO 63101

General Counsel's Office  
Kevin Thompson  
P.O. Box 360  
49220 Madison St. Ste.800  
Jefferson City, MO 65102

Missouri Public Service Commission  
Data Center  
P.O. Box 360  
200 Madison St. Ste 800  
Jefferson City, MO 65102