

FILED²

JAN 17 2007

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

Mary Keaton,

Complainants,

v.

Laclede Gas Company,

Respondent,

Missouri Public
Service Commission

Case No. GC-2007-0204

**MARY KEATON'S REBUTTAL TO LACLEDE GAS COMPANY'S
ANSWER TO COMPLAINT**

COMES NOW Mary Keaton, pursuant to the Commission's December 4, 2006 Notice of Complaint to Laclede Gas Company in the above captioned case, and submits its Rebuttal to the Laclede Gas Company's Answer to the Complaint filed by Mary Keaton against Laclede. In support thereof, Mary Keaton rebuts as follows:

1. My complaint contains a large amount of information which is the documentation that supports my complaint. I do not only claim that I did not receive the billings. The documentation clearly shows that the billings for 5431 Cabanne Avenue, 1W, St. Louis, MO were being sent to the incorrect address. I not only disagree with the amount of \$3,458.57, I tried to resolve the issue with a Laclede representative to no avail. The representative gave incorrect information and was inconsiderate to my concerns. However, the amount of the bill in dispute was transferred to 8689 Oriole Avenue 1FL, St. Louis, MO account in the amount of \$3,458.57 plus late fees, etc.
2. In rebuttal to this item: Laclede failed to include I was over charged approximately \$900.00 for service at the property located at 5431 Cabanne

Avenue, St. Louis, MO and the building was vacant. Laclede adjusted the amount of the over charge on Account #536118-002 from approximately \$900.00 to the amount of \$400.00.

3. In rebuttal to Laclede's answer to this item: 1W unit was never the "landlord unit" a tenant resided in this particular unit, but the landlord resided on the premises during the period indicated from 1993 to 2003.
4. In rebuttal to Laclede's answer to this item: Service was initiated at 8687-8689 Oriole Avenue, St. Louis, MO. All units had service in my name because of rehabilitation of the building until August 2005 when a tenant moved in at 8687 Oriole Avenue 2FL. I requested to have the service discontinued because the tenant did not transfer service into their names after being given sufficient time to do so after moving in. However, 8689 Oriole Avenue 1FL is my personal unit where I reside when I am in St. Louis, MO.
5. In rebuttal to this item: The gas service for Account No. 536118-003 was shut off March 3, 2006 by the Laclede Gas Company's service technician not March 30, 2006.
6. In rebuttal to this item: The documentation will show that bills were being sent to the incorrect address and indicates the dates of these occurrence to substantiates my claim as well as all the charges billed on the statement. I requested a statement from Laclede, which shows the charges for the period from November 3, 2005 to March 3, 2006 when the gas was shut off. When I requested the statement from Laclede, a Laclede representative stated she could not mail the bill to the address of the property management company in St. Louis, MO., but she

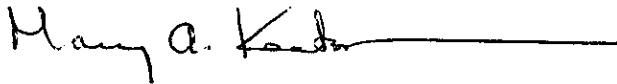
could mail the bill to Germany. When I received the statement from Laclede the charges were based on estimated readings not actual readings.

7. I rebut and disagree with Laclede's position that I received the benefit of the amount of gas billed on the account for service and the balance reflected in Laclede's records as being due and owing. Upon receipt of the Answer to the Complaint submitted by Laclede I telephoned Rick Zucker, Assistant General Counsel, Laclede Gas Company to question him on why these items were submitted to the Commission since they were not what we agreed upon and I did not receive a return telephone call. Therefore, I have no alternative other than filing this rebuttal to Laclede's Answer to the Complaint in view of the discrepancies it contains.

WHEREFORE, Mary Keaton respectfully requests that the Commission accept my rebuttal to Laclede's Answer.

The undersigned certifies that a true and correct copy of the foregoing Rebuttal was served on the Respondent, the General Counsel of the Staff of the Missouri Public Service Commission, and the Office of Public Counsel of this 12th day of January, 2007 by United States mail.

Respectfully submitted,

A handwritten signature in cursive script, reading "Mary A. Keaton", followed by a horizontal line.

Mary A. Keaton, Complainant