

DIRECT TESTIMONY  
OF  
LYNNE SHEWMAKER

Lynne Shewmaker v. Laclede Gas Company

Case No. GC-2006-0549

FILED

APR 20 2007

Missouri Public  
Service Commission

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.

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JUL 12 2007

Missouri Public  
Service Commission

Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?

A. To show that Laclede Gas Company's current meter and/or the 1<sup>st</sup> & 2<sup>nd</sup> 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

Shewmaker Exhibit No. 1  
Case No(s). GC-2006-0549  
Date 6-29-07 Rptr Jmb

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).

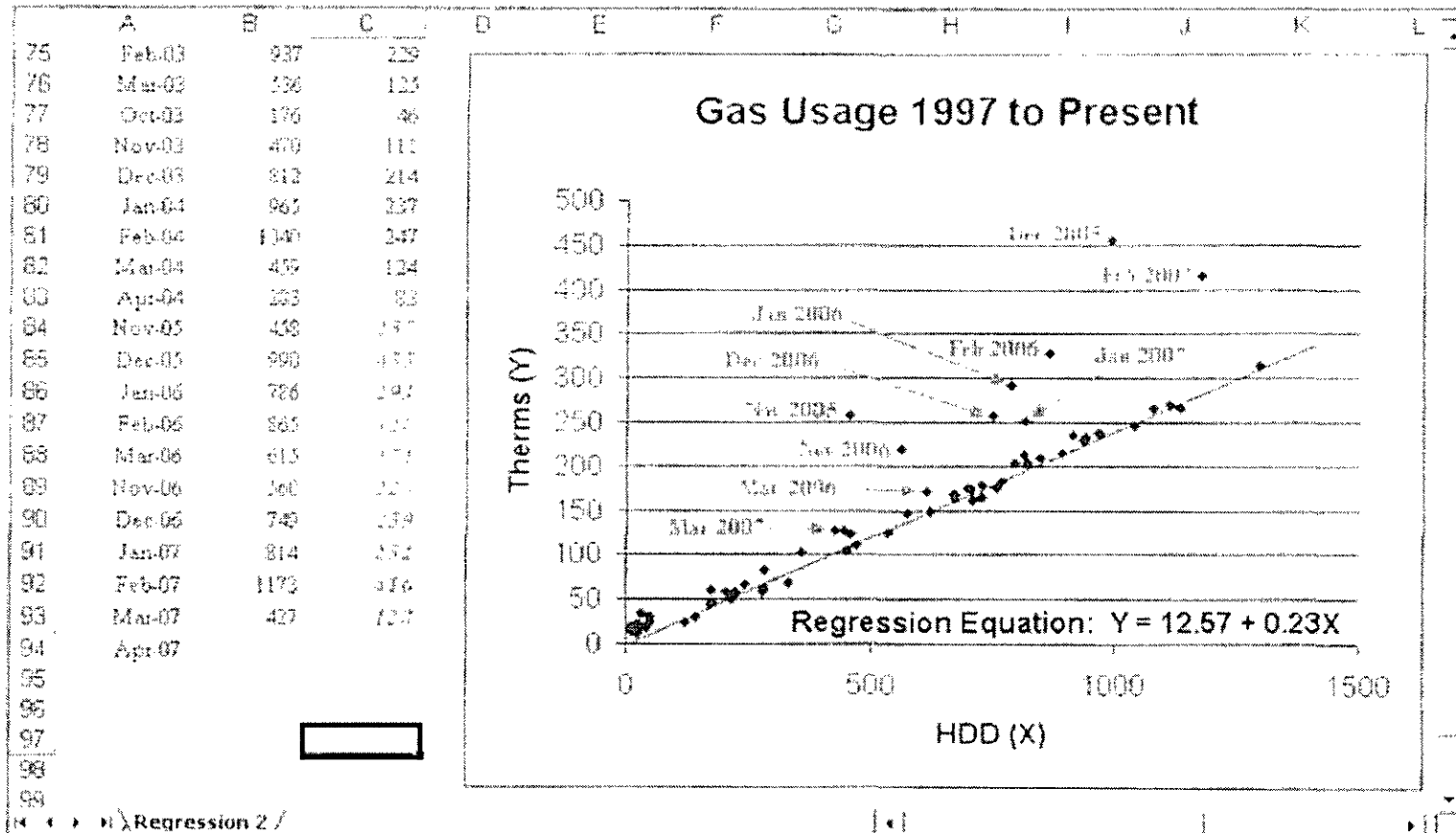
**LATE FEES.** We request that all these fees be removed from our billing.

**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



RFD values indicate data since installation of current meter and 1<sup>st</sup> & 2<sup>nd</sup> AMR readers.

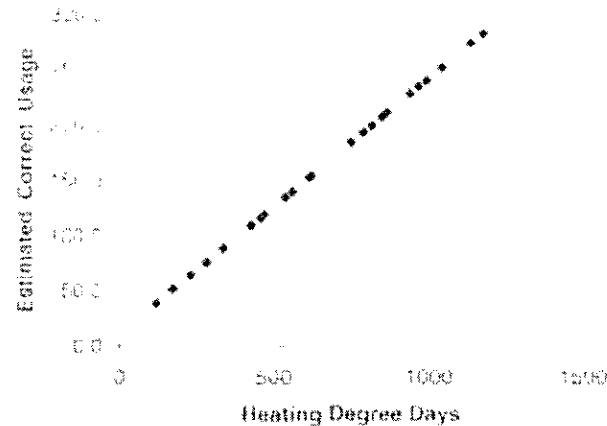
**EXHIBIT B -- CORRECT USAGE/CHARGES BASED ON REGRESSION EQUATION**

Month	IBD	Therms	IBD	Therms
Apr. 1912	2.44	59.5	2.06	69.7
May 1912	1.25	24.2	1.24	31.4
Oct. 1912	1.18	29.8	1.08	26.5
Nov. 1912	0.22	1.16	0.21	0.60
Dec. 1912	8.4	20.3	8.4	28.1
Jan. 1913	1.28	11.8	1.18	12.2
Feb. 1913	—	1.28	—	1.28
Mar. 1913	1.48	1.12	1.32	1.25
Apr. 1913	—	—	—	—
May 1913	—	—	—	—
June 1913	1.12	1.18	1.12	1.18
July 1913	—	—	—	—
Aug. 1913	1.1	2.8	—	—
Sept. 1913	0.8	1.2	1.8	1.1
Oct. 1913	1.2	8.2	2.1	7.1
Nov. 1913	0.18	—	0.18	1.1
Dec. 1913	0.22	1.1	—	—
Jan. 1914	0.1	—	0.1	—
Feb. 1914	0.2	—	0.2	—
Mar. 1914	0.2	—	—	—
Apr. 1914	0.2	—	—	—
May 1914	0.2	—	—	—
June 1914	0.2	—	—	—
July 1914	0.2	—	—	—
Aug. 1914	0.2	—	—	—
Sept. 1914	0.2	—	—	—
Oct. 1914	0.2	—	—	—
Nov. 1914	0.2	—	—	—
Dec. 1914	0.2	—	—	—
Jan. 1915	0.2	—	—	—
Feb. 1915	0.2	—	—	—
Mar. 1915	0.2	—	—	—
Apr. 1915	0.2	—	—	—
May 1915	0.2	—	—	—
June 1915	0.2	—	—	—
July 1915	0.2	—	—	—
Aug. 1915	0.2	—	—	—
Sept. 1915	0.2	—	—	—
Oct. 1915	0.2	—	—	—
Nov. 1915	0.2	—	—	—
Dec. 1915	0.2	—	—	—
Jan. 1916	0.2	—	—	—
Feb. 1916	0.2	—	—	—
Mar. 1916	0.2	—	—	—
Apr. 1916	0.2	—	—	—
May 1916	0.2	—	—	—
June 1916	0.2	—	—	—
July 1916	0.2	—	—	—
Aug. 1916	0.2	—	—	—
Sept. 1916	0.2	—	—	—
Oct. 1916	0.2	—	—	—
Nov. 1916	0.2	—	—	—
Dec. 1916	0.2	—	—	—
Jan. 1917	0.2	—	—	—
Feb. 1917	0.2	—	—	—
Mar. 1917	0.2	—	—	—
Apr. 1917	0.2	—	—	—
May 1917	0.2	—	—	—
June 1917	0.2	—	—	—
July 1917	0.2	—	—	—
Aug. 1917	0.2	—	—	—
Sept. 1917	0.2	—	—	—
Oct. 1917	0.2	—	—	—
Nov. 1917	0.2	—	—	—
Dec. 1917	0.2	—	—	—
Jan. 1918	0.2	—	—	—
Feb. 1918	0.2	—	—	—
Mar. 1918	0.2	—	—	—
Apr. 1918	0.2	—	—	—
May 1918	0.2	—	—	—
June 1918	0.2	—	—	—
July 1918	0.2	—	—	—
Aug. 1918	0.2	—	—	—
Sept. 1918	0.2	—	—	—
Oct. 1918	0.2	—	—	—
Nov. 1918	0.2	—	—	—
Dec. 1918	0.2	—	—	—
Jan. 1919	0.2	—	—	—
Feb. 1919	0.2	—	—	—
Mar. 1919	0.2	—	—	—
Apr. 1919	0.2	—	—	—
May 1919	0.2	—	—	—
June 1919	0.2	—	—	—
July 1919	0.2	—	—	—
Aug. 1919	0.2	—	—	—
Sept. 1919	0.2	—	—	—
Oct. 1919	0.2	—	—	—
Nov. 1919	0.2	—	—	—
Dec. 1919	0.2	—	—	—
Jan. 1920	0.2	—	—	—

### REGRESSION EQUATION

$$Y = 12.57 + 0.23 X$$

Estimated 'Correct' Usage based on  
Regression Equation



Month	Billing Mo.	HHB	Incorrect Therms	HHB	Correct Therms (Y)	Incorrectly Billed	Correct Charge	Overcharge	Payments	Net Due			
Nov-05	Dec-05	9900	27.5	425	117.6	5	510	5	112	5	108	5	1108
Dec-05	Jan-06	9900	27.5	600	249.7	5	100	5	329	5	311	5	19
Jan-06	Feb-06	7900	27.5	790	193.5	5	430	5	277	5	148	5	67
Feb-06	Mar-06	8000	27.5	800	211.5	5	440	5	289	5	159	5	94
Mar-06	Apr-06	8000	27.5	618	153.9	5	211	5	217	5	24	5	18
Nov-06	Nov-06	8900	27.5	890	141.2	5	294	5	191	5	107	5	107
Dec-06	Dec-06	7100	27.5	710	104.9	5	328	5	231	5	92	5	92
Jan-07	Jan-07	8100	27.5	800	200.0	5	313	5	229	5	68	5	68
Feb-07	Feb-07	11700	27.5	1170	283.1	5	800	5	325	5	162	5	162
Mar-07	Mar-07	1200	27.5	420	110.4	5	167	5	141	5	23	5	23
TOTALS						5	3,694	5	2,438	5	1,256	5	2,889

NOTE: This is a copy of the original document from the Court Clerk.

## 116410

Correct Estimated Usage -- 1044  
Incorrect Post-Reader Usage -- 2

Amount Claimant is asking to be reimbursed for by Respondent.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>

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.

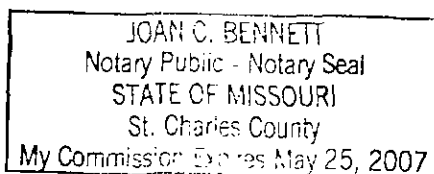
3. I hereby swear and affirm that my statements contained in the attached testimony are true and correct to the best of my knowledge and belief.

Lynne P. Shewmaker  
Lynne Shewmaker

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


Joan C. Bennett

My Commission expires \_\_\_\_\_



CERTIFICATE OF SERVICE

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

  
Lyne P. Shewmaker