

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

Linda Light,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. GC-2008-0045
	)	
Missouri Gas Energy,	)	
	)	
Respondent.	)	

**MGE'S ANSWER TO COMPLAINT**

COMES NOW Missouri Gas Energy, a division of Southern Union Company ("MGE" or "Company") and, pursuant to 4 CSR 240-2.070, respectfully states the following to the Missouri Public Service Commission ("Commission") as its answer and affirmative defenses to the Complaint filed by Ms. Linda Light:

1. MGE admits that it is a public utility subject to the jurisdiction of the Commission, as provided by law.
2. Correspondence, communications, orders and decisions regarding this matter should be addressed to the undersigned and:

Michael Noack  
Missouri Gas Energy  
3420 Broadway  
Kansas City, MO 64111  
(816) 360-5560  
(816) 360-5536 facsimile  
[Mike.Noack@SUG.com](mailto:Mike.Noack@SUG.com)

3. Ms. Light's allegations are that she was improperly billed for natural gas service, she did not receive a full refund for overpayments, and that her bills are still incorrect.
4. MGE first installed meters at Ms. Light's address (3421 NW 67<sup>th</sup> Street in Kansas

City) and two adjacent residences in a “three-plex” October 2000. When the meters were installed at these locations, the meter numbers were transposed, so although the meters and the lines were properly set, the Company billed Ms. Light and each customer for the gas used by one of their neighbors.

5. Ms. Light became an MGE customer on June 2, 2005. She contacted MGE because she was concerned about the amount of her bills. MGE initiated a service order to investigate her concerns and confirmed that she was being billed for her neighbor’s gas usage. The Company corrected the transposed meter numbers in its computer system to ensure that the three customers, including Ms. Light, would be properly billed.

6. After an analysis of the billing records and payments, MGE reimbursed Ms. Light the full amount of her overpayment, which was \$105.47. Ms. Light informed the Company that she had paid \$49.00 for a plumber to independently confirm the meter number. MGE credited her account \$49.00 for this service. The Company also credited her account \$25.00 for the length of time it took the Company to complete the corrected transactions.

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

8. The Company also removed Ms. Light’s meter on September 19, 2007 and tested the meter on September 21, 2007. Testing showed that the meter was within the accuracy tolerance required by the Company’s General Terms and Conditions and by the Code of State Regulations.

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

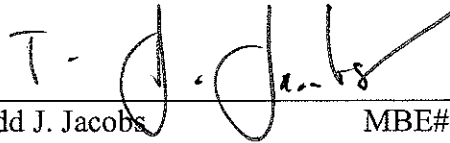
10. Except as expressly admitted in this answer, MGE denies each and every other allegation contained in the Complaint.

11. Further answering, MGE states that it has acted in accordance with its tariffs.

12. Further answering and for its first affirmative defense, Respondent states that the Complaint fails to state a claim upon which relief may be granted.

WHEREFORE, having fully answered and set forth its affirmative defenses, Respondent Missouri Gas Energy, prays the Commission dismiss the Complaint and grant such other relief as the Commission deems reasonable and just.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "T. J. Jacobs", with a checkmark at the end.

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Todd J. Jacobs MBE#52366  
Missouri Gas Energy, a division of Southern Union Company  
3420 Broadway  
Kansas City, MO 64106  
(816) 360-5976  
(816) 360-5903 facsimile  
[todd.jacobs@sug.com](mailto:todd.jacobs@sug.com)

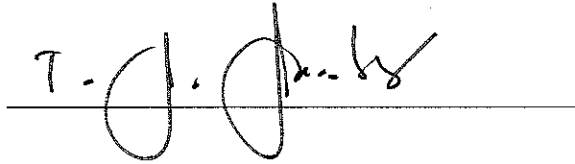
## CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic mail or U.S. Mail, postage prepaid, on September 25, 2007, to the following:

Office of the General Counsel  
Missouri Public Service Commission  
Governor State Office Building  
Jefferson City, Missouri 65101  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)

Office of the Public Counsel  
Governor State Office Building  
Jefferson City, Missouri 65101  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

Linda Light  
3421 NW 67<sup>th</sup> Street  
Kansas City, MO 64151

A handwritten signature, appearing to be "T. D. D. Light", is written over a horizontal line.