

Complaint Case Response Form

In the Matter of: Kimberly Jones v. Laclede Gas Company
Case No: GC-2008-0258

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 filed on March 12, 2008.)

1. Ms. Jones established a gas account at 1618 Arlington in November 2004 and terminated the account in November 2007.

☐ This whole statement is true.

This statement is not true because _____

2. In September 2007, Laclede rendered a bill at 1618 Arlington for unmetered gas caused by the meter's stoppage or failure to register.

☐ This whole statement is true.

This statement is not true because _____

3. Ms. Jones believes that, since the meter belongs to Laclede, the Company should be responsible for the unmetered gas.

☐ This whole statement is true.

This statement is not true because _____

4. The Commission-approved tariff directs the Company to estimate the amount of gas used by a customer during the time that the meter failed, based upon the customer's use of gas in a similar period.

☐ This whole statement is true.

This statement is not true because _____

5. Laclede properly assessed a reasonable charge for the unmetered period.

☐ This whole statement is true.

This statement is not true because _____

6. In September 2007, Laclede billed Ms. Jones an unmetered gas charge in the amount of \$432.16. At the same time, however, Laclede credited Ms. Jones for previous billings in the amount of \$232.05. This left a net amount due for unmetered gas charges of \$200.11.

☐ This whole statement is true.

This statement is not true because _____

7. After discussing this bill with Ms. Jones, Laclede issued an adjusted bill that provided a credit to Ms. Jones of \$70.33 for the unmetered period.

☐ This whole statement is true.

This statement is not true because _____

8. Therefore, the final net amount owed by Ms. Jones as a result of estimated gas usage during the unmetered period is \$129.78.

☐ This whole statement is true.

This statement is not true because _____

9. Laclede is entitled to collect this sum [\$129.78] pursuant to Section 10A of its tariff, which states that, in the event of a stoppage or failure of the meter to register, the Company shall bill the customer for such period based on an estimate of the customer's like use in a similar period.

☐ This whole statement is true.

This statement is not true because _____

10. Laclede's unmetered gas estimate in this case is not only similar to both the usage pattern and the actual amount of gas used by Ms. Jones in a like period in 2005 and 2006, it is actually a little lower.

☐ This whole statement is true.

This statement is not true because _____

11. The meter is Laclede's property; however, Laclede is not responsible for unmetered gas.

☐ This whole statement is true.

This statement is not true because _____

12. Laclede did not issue estimated bills throughout 2007. To the contrary, nearly every bill issued in 2007 was based on actual readings, although a few of those readings were based on a meter that had stopped registering usage.

☐ This whole statement is true.

This statement is not true because _____

13. Laclede has not been overcharging Ms. Jones for years.

☐ This whole statement is true.

This statement is not true because _____

14. Ms. Jones' gas usage at 1618 Arlington was very modest. Her annual gas usage of just over 600 CCF was not only low for the size of the property (a two-story with 1600 square feet), but is nearly 30% below the annual usage of a typical Laclede customer.

☐ This whole statement is true.

This statement is not true because _____

15. The portion of the monthly bill representing the fixed customer charge of \$15.50 is owed regardless of the amount of gas use.

☐ This whole statement is true.

This statement is not true because _____

16. To the extent that a customer, such as Ms. Jones, conserves her gas usage, she can, and did, reap considerable benefits by reducing the impact of volumetric charges on her bill.

☐ This whole statement is true.

This statement is 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 March 13, 2008.)

1. On October 26, 2007, Ms. Jones (Complainant) filed an informal complaint with the Consumer Services Department by phone.

☐ This whole statement is true.

This statement is not true because _____

2. Ms. Jones' meter is on the outside of her home.

☐ This whole statement is true.

This statement is not true because _____

3. On December 8, 2006, an automatic meter reading (AMR) device was installed on the outside meter.

☐ This whole statement is true.

This statement is not true because _____

4. AMR device readings were obtained and used for monthly billings through March 26, 2007, meter index of x0263.

☐ This whole statement is true.

This statement is not true because _____

5. The AMR device failed to emit readings from March, 2007 through July, 2007. Consequently, the usage was originally billed at zero consumption with the minimum customer charge from March through June 2007.

☐ This whole statement is true.

This statement is not true because _____

6. The July 2007 bill was issued based on estimated usage of 15 CCfs.

☐ This whole statement is true.

This statement is not true because _____

7. On July 24, 2007, the stalled AMR was re-programmed which resolved the meter reading issue.

☐ This whole statement is true.

This statement is not true because _____

8. On September 17, 2007, Laclede issued an adjusted bill for 299 CCfs of unmetered gas service from January 24, 2007, to July 24, 2007.

☐ This whole statement is true.

This statement is not true because _____

9. The September 17, 2007 adjusted bill canceled the previously rendered bills for this period. The charge for gas service was \$432.16 and, after an adjustment for the previous bills and payments, the remaining balance was \$200.11.

☐ This whole statement is true.

This statement is not true because _____

10. The September 17, 2007 bill also included gas service from July 24, 2007, to August 22, 2007, of 26 CCfs (actual usage), in the amount of \$45.98, for a total account balance of \$246.09.

☐ This whole statement is true.

This statement is not true because _____

11. On September 27, 2007, a Laclede representative offered Ms. Jones a 20% allowance on the adjusted bill.

☐ This whole statement is true.

This statement is not true because _____

12. Letters were mailed to Ms. Jones on September 28, 2007, and October 10, 2007.

☐ This whole statement is true.

This statement is not true because _____

13. The letter dated September 28, 2007, explained the method used by the Company to calculate an unmetered gas charge and provided a breakdown of the unmetered gas charge by month.

☐ This whole statement is true.

This statement is not true because _____

14. The letter dated October 10, 2007, explained that Laclede had recalculated the unmetered gas charge, which resulted in an allowance of \$70.33, and that the allowance would be reflected on her next gas bill.

☐ This whole statement is true.

This statement is not true because _____

15. On October 26, 2007, a Laclede representative advised Ms. Jones that no further allowances would be given and that the unmetered usage was in line with past actual usage history.

☐ This whole statement is true.

This statement is not true because _____

16. As shown below, a comparison of the estimated usage for the adjusted bill appears to be reasonable when compared to Ms. Jones' prior two years of gas usage for the same period of time:

<u>Dates of Service</u>	<u>HDDs¹</u>	<u>CCfs</u>	<u>Average Usage</u>
01/24/05 - 07/25/05	1,833	286 – Actual Usage	.1560 CCfs per HDD
01/24/06 - 07/25/06	1,777	267– Actual Usage	.1503 CCfs per HDD
01/24/07 - 07/24/07	2,016	239 – DR Estimated	.1195 CCfs per HDD

☐ This whole statement is true.

This statement is not true because _____

¹ Heating Degree Days (HDD).

17. On January 4, 2008, a closure letter was sent to Ms. Jones by Consumer Services which provided the information previously provided to Ms. Jones by Laclede along with a copy of the Commission's rule on billing adjustments, statement of bills and payments and detailed billing adjustment provided by Laclede.

☐ This whole statement is true.

This statement is not true because _____

18. The usage information and calculation used to determine Ms. Jones estimated usage is reasonable.

☐ This whole statement is true.

This statement is not true because _____

19. No tariff or rule violation exists.

☐ 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 April 9, 2008, 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.