

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

APR 30 2015

Missouri Public
Service Commission

Cloris and Ronald Torrey)
Complainant)
v.)
Laclede Gas Company)
Respondent,)

Case No. GC-2015-0111

Come now the Complainant files its Response in Opposition to Laclede Gas Company notice of satisfaction of Compliant and Motion to Dismiss Compliant. Complainants, Cloris and Ronald Torrey move the Commission for Leave to oppose Laclede Gas Companys Notice of Satisfaction of Compliant states the following:

Respondent: Laclede Gas Company must prove on the open record that by signed statement from Department Head, that no collusion exist between the above Case No. GS-2015-0111 and the United States District Court for the Eastern District of Missouri Case No. 4:14 cv-01676 CDP. Laclede Gas Company filed Motion to Dismiss, allege on the basis the compliant has been satisfied. Complainant alleges Laclede confuse and mischaracterizes Torreys compliant relevant issues to conceal harassment of the Torreys before The Commission filed Order.

Subsequently, Torreys initiated this case and alleged in their complaint that Laclede Gas Company notice of October 27, 2014 as part of a carefully plan scheme in connection with Bryan Cave's Attorneys in attempt to cover-up a pending litigation matter. Fraud upon the

court to procure State Court's final judgment to purchase forced-placed hazard insurance on "Subject Property, "for unjust enrichment.

Torrey also, alleges in their complaint that a new meter was installed on their premise in 2012, which was less than 36 months. Laclede argue, the disconnection notice required by the Public Service Commission to inspect the piping to inside gas meter sets and metering equipment every 36 months to ensure safety. Torrey allege and believes based on allegations in their complaint that on November 3, 2014 the Commission ordered Laclede to file its response to the complaint no later than December 3, 2014 and Staff to file its recommendation no later than December 18, 2014.

The Commission ordered the Staff to file recommendation no later than December 18, 2014

The Declaration of Robert R. Leonberger fails to "show "personal knowledge, states that declarant has knowledge of the matter set forth in such Staff Recommendation; and that such matters are true to the best of his knowledge and belief, but fails to state how that knowledge was obtained, thus fails to show personal knowledge.

In addition, custodian of records for Laclede Gas Company name is never identified. There is no evidence of when or how the record was created; no evidence attached to Appendix A of December 18, 2014. That showed proof or evidence of Laclede Gas Company regular business practices. There is no public inspection schedule or data attached that specific the Laclede must perform a safety inspection of its inside piping by December 31, 2014 attached to the Declaration of December 18, 2014. Exhibits are not attached to the Declaration Appendix A but are attached to the January 9, 2015 Declaration Appendix B document.

Torreys alleges and believes the perjury clause can have no effect since, if any statement about the Exhibits turn out to be false, the declarant can merely say that he was referring to some other document and exhibit not the one that got filed. Torrey alleges, Mr. Leonberger sworn statement about Exhibits thus have statue of argument, not the statue of admissible evidence. Torreys also alleges, a competent witness is one who takes an oath, has personal knowledge through his/her own sense of the facts or statements alleged, has personal recollection of those facts and is able to communicate that knowledge.

Here, Torrey brought this action pending the outcome of the Commission determination or findings.

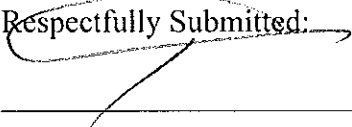
Subsequent, a genuine issue of material fact, remains in dispute Laclede Gas Company now argue that Torrey claim must be dismissed have obtained their requested relief. Laclede misconstrued the remaining issue. Torreys alleges on or about December 20, 2014 and December 26, 2014 without Torreys, permission or the Commission Order directing Laclede Gas proceeded to conduct inspection on Torrey's residence.

Torreys alleges and believes Laclede Gas unlawful harassment, threats of disconnection for failure to comply and on two occasion Laclede Gas's employees attempted to force entry on the property for inspection. Torrey believes Laclede Gas misconduct violated The Commission pending matter where no imperative safety hazard existed.

On December 29, 2014 the Torreys terminated their service as consumers with Laclede Gas based on the alleged misconduct.

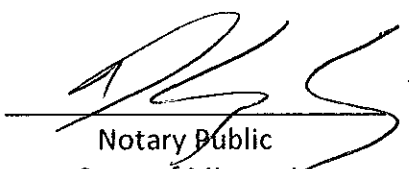
WHEREFORE: Torreys respectfully request that Commission rules in favor or Complainant.

EXECUTED ON April 14, 2015

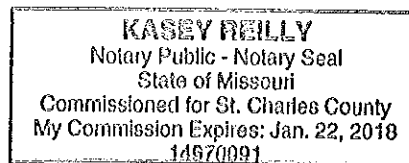
Respectfully Submitted: 

Cloris Torrey
9422 Westchester Drive
St. Louis, MO 63136

Subscribed and sworn before me on this 14 day of April 2015


Notary Public
State of Missouri

My Commission Expires: 1-22-2018



CERTIFICATION OF SERVICE

I certify that on April 14, 2015 true and correct copies of the foregoing were served Facsimile and first class postage paid Via U.S. Mail and on that date, I served the foregoing to counsels of record.

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