

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

Staff of the Missouri Public Service Commission,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2006-0318
)	
Laclede Gas Company,)	
)	
Respondent.)	

**MOTION FOR LOCAL PUBLIC HEARINGS
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW the Office of the Public Counsel and for its Motion for Local Public Hearings and Motion for Expedited Treatment states:

1. This case consists of two consolidated complaint cases against Laclede Gas Company. The Staff's complaint alleges that Laclede: 1) estimated customer usage when the trace device malfunctioned; 2) failed to schedule customers for regular reads; 3) failed to use actual reads if acquired; 4) failed to notify the customer of the opportunity to self-read the meter and report usage; and 5) failed to act quickly to investigate continued usage where Laclede has locked the meter shut or has locked the service line at the curb. Public Counsel's complaint alleges that Laclede unlawfully adjusted and continues to unlawfully adjust residential bills for a larger period than allowed by law or by tariff.

2. Public Counsel and the Commission's Consumer Services continue to receive numerous complaints against Laclede alleging the same problems identified by Staff and Public Counsel. It is clear from the unprecedented volume of complaints that a large number of Laclede customers believe Laclede's billing practices are unjust and unreasonable. Complaint numbers

provided to Public Counsel by the Staff are alarming. In the entire year 2005, Consumer Services received only 77 estimated billing complaints against Laclede, but between January 1, 2006 and July 11, 2006, Consumer Services received *519 estimated billing complaints* against Laclede. Under the more general category of complaints related to billing, Consumer Services received 411 general billing complaints against Laclede in the entire year 2005, but between January 1, 2006 and July 11, 2006, Consumer Services received *1,148 general billing complaints* against Laclede. Laclede's customers clearly believe they have been aggrieved by Laclede and want the Commission to hear their complaints. Recent data request responses from Laclede indicated that every month thousands of Laclede customers receive bills estimated for more than twelve consecutive months.

3. Public Counsel requests that the Commission schedule local public hearings in Laclede's service territory to give all customer an opportunity to testify before the Commission in this case and help the Commission gauge the extent of Laclede's statute, rule and tariff violations. Local public hearings could help identify customer accounts where Laclede imposed unlawful bill adjustments. Public Counsel also requests customer notice of the local public hearings through direct postcard mailings and through extensive newspaper and radio notice.

4. The current procedural schedule requires rebuttal testimony no later than September 6, 2006, surrebuttal testimony no later than September 28, 2006, and an evidentiary hearing October 10-13, 2006. Public Counsel requests that local public hearings be scheduled in St. Louis and St. Louis County for the first week of October 2006.

5. Public Counsel requests that the Commission expedite an order scheduling local public hearings, and to order expedite responses to this motion. Public Counsel further requests that the Commission issue an order no later than September 12, 2006 scheduling the local public

hearings. Public Counsel did not file this request earlier because Public Counsel was awaiting data request answers from Laclede that were received by counsel on August 21, 2006, twenty-one (21) days late. These data request answers indicate that the extent of Laclede's estimated billing issue is larger than originally believed, and could impact thousands of Laclede customers every billing cycle. For this reason, local public hearings are warranted to assist the Commission and the parties in better understanding the scope of the problem and to provide an opportunity for aggrieved Laclede customers to be heard.

WHEREFORE, the Office of the Public Counsel requests that the Commission expedite an order scheduling local public hearings in the St. Louis area.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 30th day of August 2006:

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