

Complaint Case Response Form

In the Matter of: Attilio J. Cosgrove v. Laclede Gas Company
Case No: GC-2008-0027

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.)

1. On April 2007, Laclede issued a bill to Mr. Cosgrove, based on an actual meter reading, that adjusted charges for gas service for the twelve months ending on March 26, 2007.

☐ This whole statement is true.

This statement is not true because _____

2. After Mr. Cosgrove disputed the April 2007 bill, Laclede replaced the meter located at 13550 Royal Glen Drive, St. Louis County (the "Home") and tested the removed meter. The meter test confirmed the accuracy of the meter and of the bills rendered to Mr. Cosgrove.

☐ These whole statements are true.

These statements are not true because _____

3. Mr. Cosgrove has been the owner and gas customer at the Home since 1996. The Home has a large gas range (90,000 Btu), a gas pool heater, and five (5) gas fireplaces. Both furnaces are electric.

☐ These whole statements are true.

These statements are not true because _____

4. The type of gas appliances in the Home allow for a great deal of discretionary gas use, and could cause gas usage to vary widely from year to year.

☐ This whole statement is true.

This statement is not true because _____

5. Between 1996 and 1999, at the Home Mr. Cosgrove averaged about 1300 CCF (hundred cubic feet) of gas use per year.

☐ This whole statement is true.

This statement is not true because _____

6. From 1999 to 2003, at the Home, Mr. Cosgrove averaged about 960 CCF of gas use per year.

☐ This whole statement is true.

This statement is not true because _____

7. For the one-year period from November 2004 to November 2005, the meter at the Home registered only 342 CCF of gas use.

☐ This whole statement is true.

This statement is not true because _____

8. During the disputed period, March 2006 to March 2007, the meter at the Home showed 1319 CCF of gas use.

☐ This whole statement is true.

This statement is not true because _____

9. During the period of March 28, 2005 through March 28, 2006, Mr. Cosgrove was billed about \$643 for gas usage at the Home.

☐ This whole statement is true.

This statement is not true because _____

10. The charges billed to Mr. Cosgrove for gas usage at the Home for the period of March 28, 2006 through March 28, 2007 were correct and reasonably comparable to prior usage.

☐ 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 September 24, 2007.)

1. On March 28, 2006, Laclede obtained an actual meter index of x 1861. Subsequent bills were based on estimated usage through February 27, 2007, to a meter index of x2191.

☐ This whole statement is true.

This statement is not true because _____

2. On March 28, 2007, Laclede performed an actual meter reading and obtained an actual meter index of x3180. Based upon this reading, Laclede determined that the account had been under-estimated.

☐ These whole statements are true.

These statement are not true because _____

3. On April 11, 2007, Laclede issued a re-bill for service from March 28, 2006, actual meter reading of x 1861, through March 28, 2007, actual meter reading of x3180, for a total of 1,319 CCF. The charge for gas service was \$1,707.19 and after credit for previous bills and payments, the account balance was \$1,174.15.

☐ These whole statements are true.

These statements are not true because _____

4. On May 4, 2007, Laclede conducted a high bill inspection per Mr. Cosgrove's request.

☐ This whole statement is true.

This statement is not true because _____

5. The Home has a gas pool heater, a gas range and five (5) sets of gas fireplace logs.

☐ This whole statement is true.

This statement is not true because _____

6. On May 7, 2007, Laclede's Customer Relations Department explained the results of the high bill inspection to Mr. Cosgrove and offered him a 12-month payment arrangement of \$104.00 per month plus the current charges for gas usage at the Home.

☐ This whole statement is true.

This statement is not true because _____

7. On May 22, 2007, Laclede completed the meter change for an AMR installation at the Home. The removal index was x3288, which verified the previous readings obtained by the company.

☐ These whole statements are true.

These statements are not true because _____

8. On June 4, 2007, a closure letter was sent to Mr. Cosgrove providing the results of Staff's investigation which included information for the Commission Rule on Billing Adjustments and a copy of the Statement of Bills and Payments.

☐ This whole statement is true.

This statement is not true because _____

9. On June 19, 2007, Mr. Cosgrove contacted the Consumer Services Manager and continued to dispute the re-bill on his account. The manager advised Mr. Cosgrove that she would review the investigation on his informal complaint and provide a response by letter.

☐ These whole statements are true.

These statements are not true because _____

10. On June 27, 2007, Laclede tested the meter that it had removed from the Home and found that it tested within the standards required by the Commission.

☐ This whole statement is true.

This statement is not true because _____

11. On June 27, 2007, Mr. Cosgrove contacted the Consumer Services Manager who advised him that her review of the investigation found nothing different from that initial investigation.

☐ This whole statement is true.

This statement is not true because _____

12. On June 27, 2007, a closure letter was sent to Mr. Cosgrove advising that the gas usage from March 28, 2006, through March 28, 2007, was based on actual consumption and that the estimated bills he had received from Laclede during this timeframe reflected estimated usage based on his previous gas usage history and Laclede's inability to obtain an actual meter reading from his gas meter. Mr. Cosgrove was also provided with the meter tests results.

☐ These whole statements are true.

These statements are not true because _____

13. Although significantly less gas was used in the immediately prior year, the billed usage is consistent with previous years consumption.

☐ 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 October 17, 2007, 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.