

From: [Zucker, Rick E.](#)
To: [Aslin, Casi](#)
Subject: Lambert v. Spire; GC-2018-0159
Date: Tuesday, January 02, 2018 7:47:36 AM
Attachments: [image001.png](#)

Casi:

I hope you enjoyed the holidays. I am writing to object to DRs 1-9 in the above referenced case, as being unduly burdensome under the circumstances. In addition, because the DRs were delivered during the holiday season we may not be able to answer all of them timely.

These DRs are written as if the Staff should perform a complete investigation of every allegation raised by the Complainant. I would ask that before we go through the process of answering all of these questions, you and Mr. Kiesling review the informal complaint report on this customer. As you will see in the report, and in our answer later this week, this is one of the worst cases of a customer abusing the system that I have ever seen. We would prefer to address the abuse rather than continue it.

Notwithstanding this objection, we will provide responses to your questions. For DR 3, I would note that there are many recorded phone conversations with this customer, and each file is fairly large, so it will likely take some effort to get them to you electronically.

After you have had a chance to review the informal report, please call me if you wish to discuss it.

Thanks Casi.

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Rick Zucker
Associate General Counsel

January 8, 2018

VIA ELECTRONIC MAIL

Casi Aslin, Esq.
Missouri Public Service Commission Staff
200 Madison Street
Jefferson City, MO 65101
casi.aslin@psc.mo.gov

Re: Case No. GC-2018-0159; Lambert v. Spire Missouri
Objection to Data Requests 10-18

Dear Casi:

On behalf of Spire Missouri Inc. ("Spire"), and pursuant to Commission Rule 2.090(2), I am writing to object to DRs 10-18 received by Spire in the above-referenced case.

Under the circumstances of this case, Staff's requests are overly broad and unduly burdensome. As you can see from the Company's report to the Staff on this customer's informal complaint, and in the data provided in response to Staff DRs 1-9, this case is about a customer who has abused the regulatory process and rules and wasted a great deal of Company resources, all without paying a cent for gas service received for more than a year and a half. We do not believe it is appropriate to place further burdens on the Company's employees without first addressing the frivolous nature of Complainant's complaint.

In addition, these DRs contemplate what appears to be a full operational audit of the Company's compliance with a wide range of gas safety rules going back to January 1, 2014, over a customer complaint alleging one instance of property damage. Under the circumstances, these requests are overly broad and burdensome.

I look forward to speaking with you this week to discuss this matter.

Sincerely,

/s/ Rick Zucker

cc: M. Polster
J. Garner