

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

Dr. Hortense Lucinda Harrison)	
)	
Complainant,)	
v.)	Case No. GC-2008-0041
)	
Laclede Gas Company,)	
Respondent.)	

LACLEDE GAS COMPANY’S ANSWER TO COMPLAINT

COMES NOW Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s August 14, 2007 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Dr. Hortense Lucinda Harrison (“Dr. Harrison” or the “Customer”). In support thereof, Laclede states as follows:

1. In her complaint, Dr. Harrison states her belief that she is being overcharged for gas service. Laclede has reviewed her account and found that her gas charges are based on actual meter readings, and are both accurate and in reasonable proportion to usage expected at her property. However, there appears to be a small discrepancy in the start date for Dr. Harrison’s account, and Laclede is willing to make an adjustment based on a later start date for this account.

2. According to St. Charles County public real estate records, the home at 40 Gateview Court in O’Fallon¹ (the “Home” or “Property”) was built in the Fall of 2006, and sold by the builder, T.R. Hughes, to Dr. Harrison in December 2006. The Home sits on a half-acre lot, has 5 bedrooms, 4 bathrooms, and has total area of 3,755 square feet.

¹ The records show the property in the city of O’Fallon but with a Lake St. Louis mailing address.

3. In response to Dr. Harrison's allegations in section 2 of the complaint, Laclede is without information or belief to respond to the Customer's allegations that she closed on her home and took occupancy on December 6, 2006, but Laclede accepts this statement as true.

4. In response to the allegations that Dr. Harrison did not receive a bill in January or February 2007, and that she first received a bill during the week of March 26, Laclede states that in transferring the account for the Property from the builder, T.R. Hughes, to Dr. Harrison, it appears that the forwarding address for T. R. Hughes was retained for billing purposes rather than the home address. The result would have been that bills rendered by Laclede in January, February and March 2007 would have been sent to the builder's office rather than to the Home. On March 14, 2007, Dr. Harrison called Laclede, at which time this issue was identified and the billing address was corrected. The bill that Dr. Harrison states that she received during the week of March 26, 2007 was actually originally sent by Laclede on March 1.

5. Laclede admits that it received a payment of \$200 on Dr. Harrison's account on December 29, 2006.

6. Laclede admits that it received a payment of \$229.91 on Dr. Harrison's account on April 3, 2007.

7. Laclede admits that it sent a billing adjustment to Dr. Harrison on April 13, 2007, crediting all previous bills issued under her account and rebilling the period from November 17, 2006 to March 27, 2007, based on actual meter readings obtained on March 7, 2007, and again on March 27, 2007, in connection with the repair of a faulty AMR module. Laclede further admits that its April 13 rebill contained the language

recited in the Complaint, offering Dr. Harrison the opportunity to pay the adjusted bill in installments, as required by Commission order.

8. Laclede admits that Dr. Harrison has disputed the adjusted bill and that, in response to her complaint to Laclede's Customer Relations Department, Laclede sent a service representative to the Home on May 1, 2007 to conduct a high-bill inspection, which inspection confirmed the accuracy of the billed usage.

9. Laclede denies that the Customer was billed \$803.19 for the month of March. As stated above, the adjusted bill, which resulted in a balance of \$803.19, covered a period of more than four months, all of which were winter months.

10. Laclede admits that its start date of November 22, 2006 is prior to the date of December 6, 2006 that Dr. Harrison claims to be her occupancy date. Laclede is willing to make an adjustment to accommodate the Customer on this point.

11. Laclede admits that it has included Lake St. Louis taxes on Dr. Harrison's bills rather than City of O'Fallon taxes. Laclede will make the appropriate adjustment on this tax issue.

12. Regarding the neighbor's bill, Laclede has identified a meter issue there and is addressing it.

WHEREFORE, Laclede respectfully requests that the Commission accept Laclede's Answer and find that the Company has violated no laws, or rules, decisions or orders of the Commission in this case.

Respectfully submitted,

/s/ Rick Zucker

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Answer was served on the Complainant, the General Counsel of the Staff of the Missouri Public Service Commission, and the Office of Public Counsel on this 12th day of September, 2007, by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch