

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

Bridgette Young)	
	Complainant,)	
)	
)	Case No. GC-2010-0248
v.)	
)	
)	
Laclede Gas Company)	
	Respondent.)	
)	

**POST-HEARING BRIEF OF THE
STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION**

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BACKGROUND

Bridgette Young is a customer of Laclede Gas Company. On March 3, 2010, Ms. Young filed a formal complaint against Laclede for excessive gas bills and overcharging. Ms. Young alleged that subsequent to the repair of a gas leak somewhere in front of her home in August 2008, her gas bills decreased. Ms. Young feels that she is entitled to a credit on her bill due to her belief that she was charged for the gas that was leaking prior to the August 2008 repair.

As part of the formal complaint process, the Commission ordered its Staff to conduct an investigation as to the cause of the complaint.¹ The Staff filed its Report of Investigation and Recommendation on May 11, 2010.²

¹ 4 CSR 240-2.070(10).

The Commission convened a prehearing conference on May 25, 2010. The parties were unable to reach a settlement and an evidentiary hearing was scheduled. The formal evidentiary hearing took place on August 18, 2010. Laclede and Ms. Young appeared via video conference from the Commission's St. Louis office and the Staff appeared in Jefferson City.

Complainant Bridgette Young's Gas Usage History

The Staff conducted its investigation by speaking with Ms. Young, Laclede representatives, and analyzing Ms. Young's gas usage history. The Staff also reviewed meter readings and documentation of phone calls made to Laclede by Ms. Young.

The Staff's investigation found that sometime around August 2008, a leak was repaired somewhere in the front yard of Ms. Young's home or in the street in front of Ms. Young's home. Ms. Young has acknowledged that Laclede repaired the service line in front of her home.³ Any gas that leaked from the service line would not have flowed through Ms. Young's meter, so it would not affect her monthly usage or bills.

Ms. Young's usage history confirms fairly consistent usage before and after repair to the service line in front of Ms. Young's home.⁴

Staff's investigation found the following usage for Ms. Young:

2/08/10 – 2/09/09 651 CCf vs. 4509 Heating Degree Days (HDD) = .1444 avg. use per HDD.

2/09/09 – 2/11/08 646 CCf vs. 4888 HDD = .1322 avg. use per HDD.

² Staff Ex. 4 Staff's Report of Investigation and Recommendation

³ Bridgette Young, Vol. 2 p. 34

⁴ Staff witness Schierman-Duncan, Vol. 2 p. 82; *see* Staff Ex. 4

2/11/08 – 2/09/07 635 CCf vs. 4296 HDD = .1478 avg. use per HDD.

2/09/07 – 2/22/06 518 CCf vs. 3945 HDD = .1313 avg. use per HDD.

Laclede Exhibits 1 and 2 also show a consistent usage pattern. In fact, the total amount Ms. Young was billed for any single year between 2007, 2008, 2009 and 2010 fluctuated less than \$100.⁵ The factors that could have led to the slight fluctuations in Ms. Young's usage may include changes in the weather, the amount of time Ms. Young spent at home and the price of natural gas.⁶

Conclusion

The leak that was repaired on the service line in front of Ms. Young's home could not have affected Ms. Young's personal gas usage because it never passed through the meter. It is likely that any decreases on gas bills that Ms. Young may have experienced were due to a combination of factors such as the price of natural gas and the weather. Therefore, based upon Staff's investigation and the evidence presented by the parties, Staff does not believe that Laclede has violated any Commission rules or any of its tariff provisions.

⁵ See Laclede Ex. 2

⁶ *Id.*; see Laclede Ex. 2

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 23rd day of September, 2010.

/s/ Samuel D. Ritchie
