



exceptions pursuant to this statute are for information required to be open to public inspection by Chapter 386 or 610, or by order of the Commission, or disclosed by the Commission or a Commissioner in the course of hearing or a proceeding.

3. Staff previously objected to DE DRs 206 and 207 that requested copies of all complaints received by Staff regarding the current effective residential rate design of LAC and MGE since each company's last rate case on the basis that the requests were (1) vague and ambiguous; (2) unduly burdensome and overly broad; (3) irrelevant; and (4) sought personally identifiable customer information protected from disclosure pursuant to Section 386.480, RSMo. Staff's objections were sustained by the Regulatory Law Judge.

4. Rather than raise another objection, Staff proposes to provide the information requested by DE in a way that allows DE to access the information it desires while relieving Staff from the burden of sorting and redacting the mass of consumer inquiries and complaints.

5. While DR 211 limits DE's request to certain sub-issue categories of complaints and inquiries and asks for customer-specific information to be redacted, Staff does not have the resources of time or personnel necessary to review each of the estimated thousands of complaints and inquiries to find those responsive to DE's request or to remove customer-specific information from them. The software utilized by the Commission to compile and organize customer complaints does not permit users to redact information electronically

from the requested data. In order for Staff to redact confidential information from the customer complaints, it would be necessary for Staff to print all of the information in hard copy form, and manually redact all confidential information. Therefore, in order to provide a timely and responsive answer to DE's request, Staff proposes to forward all of the unsorted and un-redacted complaints and inquiries from the requested time period to DE, who can then redact personally-identifiable information as required and search for those complaints and inquiries that touch on the issues it is interested in, so long as the Commission establishes appropriate protections by order.

6. Staff's proposal depends upon the Commission issuing an appropriate protective order pursuant to 4 CSR 240-2.135, (3) and (4), and in accordance with Supreme Court Rule 56.01(c), authorizing Staff to provide the requested consumer complaints consistent with the requirements of § 386.480; requiring DE to keep all personally-identifying customer information (including names, addresses, phone numbers, etc.) confidential; prohibiting DE from providing the information included in Staff's response to any other individual or entity without further order of the Commission; and requiring DE to destroy the data provided once Case Nos. GR-2017-0215 and GR-2017-0216 are closed.

7. Customers of the public utilities which the Commission regulates regularly call in to the Commission to submit inquiries and complaints regarding their service for which they provide their personal contact information. This information is sensitive personal information intended for use by the Commission

for the purposes of inquiries and complaints cases only, and not for release to the general public. Release of this information to third parties could cause harm to these customers if their contact information was sold to telemarketers or used for purposes which these customers did not authorize.

**WHEREFORE**, Staff asks this Commission to issue a protective order (1) authorizing Staff to provide the requested consumer complaints and inquiries to DE consistent with the requirements of § 386.480; (2) requiring DE to keep all personally-identifying customer information (including names, addresses, phone numbers, etc.) confidential; (3) prohibiting DE from providing the information included in Staff's response to any other individual or entity without further order of the Commission; and (4) requiring DE to destroy the data provided once Case Nos. GR-2017-0215 and GR-2017-0216 are closed; and to grant such other and further relief as the Commission considers just in the circumstances.

**/s/ Whitney Payne**

Whitney Payne

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 28th day of August, 2017, to all counsel of record.

**/s/ Whitney Payne**

**MISSOURI DEPARTMENT OF ECONOMIC DEVELOPMENT  
DIVISION OF ENERGY  
DATA REQUEST**

**Laclede Gas Company's Request to Increase Its Revenue for Gas Service,  
CASE NO. GR-2017-0215  
and  
Laclede Gas Company d/b/a Missouri Gas Energy's Request to Increase Its  
Revenue for Gas Service,  
CASE NO. GR-2017-0216**

Requested From: Missouri Public Service Commission Staff ("Staff")  
Requested By: Martin Hyman ([martin.hyman@ded.mo.gov](mailto:martin.hyman@ded.mo.gov)), 573-526-3769  
Date of Request: August 17, 2017

Information Requested:

Please refer to the attached Exhibit No. 103 from Case No. GR-2009-0355.

1. Does Staff's customer inquiry/complaint database contain the sub-issues found on pages 4 through 6 of the exhibit?
2. If the answer to Question 1 above is in the affirmative, then please provide all customer complaints/inquiries matching the following sub-issues for both (a) Laclede Gas Company from September 1, 2013 onward, and (b) Laclede Gas Company d/b/a Missouri Gas Energy from October 1, 2014 onward, with personally identifiable/customer-specific information redacted:
  - a. Assistance for Payment
  - b. Billing in General
  - c. Budget Plan
  - d. Calculated Bill Policy
  - e. Company Error
  - f. Customer/Minimum Charge
  - g. Disputed Bill
  - h. E-billing
  - i. Estimated Bill
  - j. Final Bill
  - k. General Information
  - l. High Bill
  - m. Incorrect Bill
  - n. Infrastructure Surcharge
  - o. Minimum Bill
  - p. Oppose Rate Increase

- q. Possible Complaint
- r. Projected Gas Increase
- s. Purchased Gas Adjustment
- t. Purchased Gas Adjustment Rate/Utility Extensions
- u. Rates in General
- v. Rebill
- w. Refunds
- x. Service in General
- y. N/A

To the extent that any of the requested information is not available, please provide the remaining data where possible. If another party to this case issued a similar Data Request, then provide a copy of the response to that Data Request.

Response Provided:

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The information provided in response to the enclosed data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to promptly notify the requesting party if, during the pendency of Case Nos. GR-2017-0215 and GR-2017-0216 before the Missouri Public Service Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

**Response Provided By:** \_\_\_\_\_ **Date:** \_\_\_\_\_