

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

Norman Harrold,)	
)	
Complainant,)	
v.)	Case No. GC-2007-0311
)	
Laclede Gas Company,)	
Respondent.)	

LACLEDE GAS COMPANY’S ANSWER TO COMPLAINT

COMES NOW Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s February 22, 2007 Notice of Complaint in the above captioned case, and submits its Answer and Motion to Dismiss the Complaint filed against Laclede by Norman Harrold (“Mr. Harrold” or the “Customer”). In support thereof, Laclede states as follows:

1. In his complaint, Mr. Harrold objects to a billing for service rendered at 5918 Theodore (the “Property”) between September 2004 and April 2006. Mr. Harrold’s objection is based on two points. First, Mr. Harrold argues that he should not be responsible for gas service during this period because the account was in his daughter’s name. Second, he claims that a billing adjustment performed by Laclede was overstated because the property was essentially vacant during the adjustment period.

2. Mr. Harrold states that he was responsible for gas service at the Property until 2001, when his daughter moved into the Property and established her own account. Mr. Harrold states that his daughter lived in the Property until the fall of 2004, at which time she moved to another address. He claims that the Property was thereafter vacant during the September 2004 – April 2006 billing adjustment period.

2. In response, Laclede agrees that gas service at the Property was in Mr. Harrold's name until 2001, and that Mr. Harrold and his wife owned the Property during this time, and in fact are still the owners. Laclede does not dispute that the party who established service at the Property in 2001 is Mr. Harrold's daughter. Laclede notes that in December 1999, Mr. Harrold also became the owner and gas customer at 15638 Debridge in Florissant, MO. Further, while Laclede does not have actual knowledge that Mr. Harrold's daughter moved out of the property in the fall of 2004, it can confirm that she established a gas account at a different address in September 2004.

3. Based on statements made by Mr. and Mrs. Harrold, after the daughter moved out of the Property in the fall of 2004, the property was vacant and Mr. Harrold, as owner, chose to maintain gas service and make the payments on the gas account, and in November 2004, even had the gas bills for the Property mailed to his home on Debridge. The Harrolds have indicated that following the daughter's vacation of the Property, service should have been transferred to their name as the responsible party.

4. Laclede obtained an actual meter reading at the Property in March 2006 that indicated that the account had been underbilled. Based on Laclede's records that show two letters sent in September 2005 seeking the customer's cooperation to obtain a meter reading at the Property, Laclede performed a billing adjustment dating back to September 2004, which was 12 months prior to these inquiries. The billing adjustment covered an 18-month period and added approximately \$700 to the balance owed at the Property. In accordance with the Stipulation and Agreement in Case No. GC-2006-0318, in March 2007, Laclede provided a credit to Mr. Harrold's account at the Property in the amount of \$301.

5. Laclede is without information and belief to determine whether the property was actually vacant during the adjustment period, and on that basis denies Mr. Harrold's usage theories. Nevertheless, Laclede will contact Mr. Harrold to discuss these matters and see whether the parties can reach a resolution to this dispute.

WHEREFORE, Laclede respectfully requests that the Commission accept Laclede's Answer.

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 28th day of March, 2007 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch