

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

Mary Keaton,)	
)	
Complainants,)	
v.)	Case No. GC-2007-0204
)	
Laclede Gas Company,)	
Respondent.)	

LACLEDE GAS COMPANY’S ANSWER TO COMPLAINT

COMES NOW Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s December 4, 2006 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Mary Keaton. In support thereof, Laclede states as follows:

1. Ms. Keaton is a resident of California who owns properties in the City of St. Louis, Missouri. While Ms. Keaton’s complaint contains a large amount of information, it appears that the essence of her complaint pertains to billings by Laclede at 5431 Cabanne, Apt. 1W, in St. Louis (the “Residence”) that resulted in a balance in the amount of \$3,458.57. Ms. Keaton complains that she did not receive any of these billings, and requests that the balance be adjusted to a reasonable amount.

2. In response, Laclede states that City of St. Louis records indicate that the Ms. Keaton purchased the Residence in September 2004. Ms. Keaton changed gas service at the Residence into her name in February 2005, under Laclede Account No. 536118-002. At the customer’s request, service was turned off at the Residence in August 2005. At that time, the meter read x3797. As of October 2005, the amount owed by Ms. Keaton on the account was approximately \$400.

3. The prior history indicates very high natural gas usage at the Residence. From 1993 to 2003, the customer there consistently used approximately 3500 ccf of gas per year. The budget bill on the account just prior to Ms. Keaton becoming the customer was \$296 per month. This usage is so high because Apartment 1W appears to be a “landlord unit” which meters the heat for all of the units in the building.

4. On October 24, 2005, Laclede informed Ms. Keaton that service could be reestablished on or after November 1, 2005, upon payment of \$200. Ms. Keaton made a \$200 payment, and service was initiated on November 3, 2005 under Account No. 536118-003, at which time the meter still read x3797. At that time, the mailing address for bills generated at the Residence was established at 8689 Oriole (2nd Floor), another property purchased by Ms. Keaton’s trust in the fall of 2004. As of November 2005, the 2nd floor account at the Oriole address was listed in Ms. Keaton’s name.

5. Account No. 536118-003 was only open from November 3, 2005 to March 30, 2006. The usage during this period was 2315 ccf, which is consistent with, if not somewhat less than, usage in past years. This usage generated billings totaling \$3,458.57.

6. Ms. Keaton claims that she was not receiving the billings on the Residence at her home in California. Laclede is without information or belief to confirm or deny Ms. Keaton’s allegation on this point. It should be noted that there have been a number of address changes on Ms. Keaton’s accounts, which have included her address in California and the address of a property management company she uses here in St. Louis.

7. Nevertheless, it appears that the customer received the benefit of the amount of gas billed on the account for service at the Residence and the balance reflected

in Laclede's records is due and owing. Laclede has contacted Ms. Keaton in California and is continuing to work with her regarding the balance due on the account at the Residence.

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 3rd day of January, 2007 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch