

Exhibit No.:  
Issues: Tariff Issues  
Witness: Thomas M. Imhoff  
Sponsoring Party: MO PSC Staff  
Type of Exhibit: Surrebuttal Testimony  
Case No.: GT-2008-0374  
Date Testimony Prepared: December 19, 2008

**MISSOURI PUBLIC SERVICE COMMISSION**

**UTILITY OPERATIONS DIVISION**

**SURREBUTTAL TESTIMONY**

**OF**

**THOMAS M. IMHOFF**

**LACLEDE GAS COMPANY**

**CASE NO. GT-2008-0374**

**Jefferson City, Missouri  
December 2008**

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

In the Matter of the Laclede Gas Company )  
Tariff Filing to Allow Estimated Billing )  
Whenever an Automatic Meter Reader )  
Fails to Send Readings of Actual Usage. )

Case No. GT-2008-0374

**AFFIDAVIT OF THOMAS M. IMHOFF**

**STATE OF MISSOURI**     )  
                                      ) ss  
**COUNTY OF COLE**     )

Thomas M. Imhoff, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 4 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

  
Thomas M. Imhoff

Subscribed and sworn to before me this 18<sup>th</sup> day of December, 2008.



SUSAN L. SUNDERMEYER  
My Commission Expires  
September 21, 2010  
Callaway County  
Commission #06942086

  
Notary Public

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**OF**  
**THOMAS M. IMHOFF**  
**LACLEDE GAS COMPANY**  
**CASE NO. GT-2008-0374**

A. Thomas M. Imhoff, P.O. Box 360, Jefferson City, Missouri 65102.

A. I am the Rate & Tariff Examination Supervisor in the Energy Department of Missouri Public Service Commission (Commission).

A. I attended Southwest Missouri State University at Springfield, Missouri, from 1977 to 1981. I received a Bachelor of Science degree in Business Administration, with a major in Accounting, in May 1981. In May 1987, I successfully completed the Uniform Certified Accountant (CPA) examination and subsequently received the CPA certificate. I am currently licensed as a CPA in the State of Missouri.

A. From October 1981 to December 1997, I worked in the Accounting Department of the Commission, where my duties consisted of directing and assisting with audits and examinations of the books and records of public utilities operating within the State of Missouri under the jurisdiction of the Commission. On January 5, 1998, I assumed the position of Regulatory Auditor IV in the Gas Tariffs/Rate Design Department, where my duties consist of analyzing applications, reviewing tariffs and

1 making recommendations based upon those evaluations. On August 9, 2001, I assumed my  
2 current position of Rate & Tariff Examination Supervisor in the Energy Tariffs/Rate Design  
3 Department, where my duties consist of directing Commission Staff within the Department,  
4 analyzing applications, reviewing tariffs, and making recommendations based upon my  
5 evaluations and the evaluations performed by Staff within the Department.

6 Q. Have you previously filed testimony before this Commission?

7 A. Yes. A list of cases in which I have filed testimony before this Commission is  
8 attached as Schedule 1 to my Surrebuttal Testimony.

9 Q. What is the nature of your Surrebuttal Testimony?

10 A. My Surrebuttal Testimony addresses the Office of the Public Counsel (OPC)  
11 witness Barbara A. Meisenheimer's fourth and sixth concerns in her Rebuttal Testimony  
12 concerning the proposed dead meter tariff proposal of Laclede Gas Company (Laclede or  
13 Company).

14 **OPC'S FOURTH CONCERN**

15 Q. On page 12, lines 11 through 22, OPC witness Meisenheimer contends that this  
16 proposed amended tariff is inconsistent with Tariff sheets R-6-a Part 6. (3) R-6-a Part 6. (4),  
17 R-11 12, and Rule 14 (1)(E). Do you agree?

18 A. No. Laclede's amended proposed tariff indicates that it would discontinue  
19 service to a customer pursuant to normal discontinuance of service procedures. This proposed  
20 tariff does not preclude a customer from providing self reads in the event of a non-working  
21 AMR. However, in the event of a "dead meter", Laclede is obligated to repair or replace that  
22 meter for safety and/or for accurate readings of actual gas usage. The customer is required by  
23 tariff and rule [4 CSR 240-13.050(1)(E)] to allow Laclede access to the meter or AMR in

1 order to make the proper repairs/replacement. Staff finds the proposed tariff to be consistent  
2 with Laclede's current tariff provision which addresses customers that do not allow the  
3 Company access to a working meter and do not provide self reads.

4 Q. Why is Laclede obligated to repair or replace a "dead meter" or an AMR not  
5 registering?

6 A. Laclede must have at least one actual meter read on an annual basis to remain  
7 compliant with its tariff. It is imperative that the customer allow Laclede access to the meter  
8 or AMR for repairs so Laclede can obtain an actual meter read from a properly functioning  
9 meter or AMR.

10 **OPC'S SIXTH CONCERN**

11 Q. OPC witness Meisenheimer believes that the amount of  
12 disconnections/reconnections revenues Laclede would receive from the implementation of the  
13 proposed tariff would result in greater revenues. Do you agree?

14 A. Not necessarily. It is possible Laclede could see an increase in  
15 disconnection/reconnection revenues from this proposed tariff, but Staff does not believe it  
16 will be significant. As previously stated, Laclede will be abiding by their disconnection  
17 procedures. Therefore, these are cost-causer revenues that are borne by the customer causing  
18 the cost, and if Laclede can't gain access to the meter, it can't disconnect the customer when  
19 the meter is in a multiple occupancy building. In a single occupancy residence, Laclede has  
20 the right by tariff to disconnect the service when the customer does not allow Laclede access  
21 to the meter when that meter is not registering and in need of repair or replacement.

22 Q. Is Laclede proposing to change its reconnection rate?

Surrebuttal Testimony of  
Thomas M. Imhoff

1           A.     No. This rate was established in Laclede's most recent rate case, and reflects  
2 Laclede's cost of providing this service.

3           Q.     Does this conclude your Surrebuttal Testimony?

4           A.     Yes it does.

LACLEDE GAS COMPANY  
CASE NO. GT-2008-0374

Summary of Cases in which prepared testimony was presented by:  
THOMAS M. IMHOFF

<u>Company Name</u>	<u>Case No.</u>
Terre-Du-Lac Utilities	SR-82-69
Terre-Du-Lac Utilities	WR-82-70
Bowling Green Gas Company	GR-82-104
Atlas Mobilfone Inc.	TR-82-123
Missouri Edison Company	GR-82-197
Missouri Edison Company	ER-82-198
Great River Gas Company	GR-82-235
Citizens Electric Company	ER-83-61
General Telephone Company of the Midwest	TR-83-164
Missouri Telephone Company	TR-83-334
Mobilpage Inc.	TR-83-350
Union Electric Company	ER-84-168
Missouri-American Water Company	WR-85-16
Great River Gas Company	GR-85-136
Grand River Mutual Telephone Company	TR-85-242
ALLTEL Missouri, Inc.	TR-86-14
Continental Telephone Company	TR-86-55
General Telephone Company of the Midwest	TC-87-57
St. Joseph Light & Power Company	GR-88-115
St. Joseph Light & Power Company	HR-88-116
Camelot Utilities, Inc.	WA-89-1
GTE North Incorporated	TR-89-182
The Empire District Electric Company	ER-90-138
Capital Utilities, Inc.	SA-90-224
St. Joseph Light & Power Company	EA-90-252
Kansas City Power & Light Company	EA-90-252
Sho-Me Power Corporation	ER-91-298
St. Joseph Light & Power Company	EC-92-214
St. Joseph Light & Power Company	ER-93-41
St. Joseph Light & Power Company	GR-93-42
Citizens Telephone Company	TR-93-268
The Empire District Electric Company	ER-94-174
Missouri-American Water Company	WR-95-205
Missouri-American Water Company	SR-95-206
Union Electric Company	EM-96-149
The Empire District Electric Company	ER-97-81
Missouri Gas Energy	GR-98-140
Laclede Gas Company	GR-98-374
Laclede Gas Company	GR-99-315
Atmos Energy Corporation	GM-2000-312
Ameren UE	GR-2000-512
Missouri Gas Energy	GR-2001-292
Laclede Gas Company	GT-2001-329



Laclede Gas Company	GR-2001-629
Missouri Gas Energy	GT-2003-0033
Aquila Networks – L&P	GT-2003-0038
Aquila Networks – MPS	GT-2003-0039
Southern Missouri Gas Company, L.P.	GT-2003-0031
Fidelity Natural Gas, Inc.	GT-2003-0036
Atmos Energy Corporation	GT-2003-0037
Laclede Gas Company	GT-2003-0032
Union Electric Company d/b/a Ameren UE	GT-2003-0034
Laclede Gas Company	GT-2003-0117
Aquila Networks MPS & L&P	GR-2004-0072
Missouri Gas Energy	GR-2004-0209
Missouri Pipeline Company & Missouri Gas Company	GC-2006-0491
Atmos Energy Corporation	GR-2006-0387
Laclede Gas Company	GR-2007-0208
Missouri Gas Utility Company	GR-2008-0060
Trigen-Kansas City Energy Group	HR-2008-0300