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

Tom Scheibelhut, Business Manager,)
On Behalf of O.C.A.W., AFL-CIO,)
Gas Workers Local 5-6)
Complainant,)
vs.)
Laclede Gas Company,)
Respondent.)

Case No. GC-98-497

NOTICE OF COMPLAINT

Laclede Gas Company
720 Olive Street
St. Louis, Missouri 63101
CERTIFIED MAIL

Be advised that on May 4, 1998, Tom Scheibelhut, Business Manager, on behalf of O.C.A.W., AFL-CIO, Gas Workers Local 5-6, filed a complaint with the Missouri Public Service Commission against Laclede Gas Company, a copy of which is enclosed. Pursuant to 4 CSR 240-2.070, the Respondent has 30 days from the date of this notice to either file an answer or satisfy the complaint. The Respondent shall file an answer or an explanation of the satisfaction of the complaint on or before June 12, 1998, with the Secretary of the Missouri Public Service Commission, P.O. Box 360, Jefferson City, Missouri 65102, and send a copy to the Complainant. A copy of this Notice was mailed to the Complainant.

BY THE COMMISSION



**Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge**

(S E A L)

Mills, Deputy Chief Regulatory Law Judge

Dated at Jefferson City, Missouri,
on this 13th day of May, 1998.

Copy to: William M. Franz
Franz & Franz, P.C.
10820 Sunset Office Drive
Suite 350
St. Louis, MO 63127

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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MISSOURI
PUBLIC SERVICE COMMISSION

Tom Scheibelhut, Business Manager)
On Behalf of O.C.A.W., AFL-CIO,)
Gas Workers Local 5-6,)

Complainant,)

vs.)

Laclede Gas Company,)

Respondent.)

Case No. GC-98-497

VERIFIED COMPLAINT

Comes Now Tom Scheibelhut, Business Manager, on behalf of O.C.A.W., AFL-CIO, Gas Workers Local 5-6, and, in support of his Complaint, states as follows:

1. All correspondence, communications, orders, and decisions in this matter should be addressed to the following:

William M. Franz
FRANZ & FRANZ, P.C.
10820 Sunset Office Drive
Suite 350
St. Louis, MO 63127
314\909-8686
FAX 314\909-0001

1. Complainant resides at 4389 Ironside Lane, St. Louis, MO 63128-3769, and has Local Union offices at 7750 Olive Boulevard, St. Louis, MO 63130-2043.

2. Respondent Laclede Gas Company, of 720 Olive Street, Suite 1500, St. Louis, MO 63101, is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri.

3. As the basis of this Complaint, Complainant states the following facts: On January 9, 1998, a leak truck was dispatched to a number 2 leak by Laclede Gas Company at 3401 South Kingshighway, St. Louis, MO. The leak crew disconnected the service at the main in order to replace a corporation cock on the service at 3401 South Kingshighway for the customer, Valvoline Instant Oil Change.

In order to reinstate service, the leak crew air tested the service from main to the outside riser. Service was tested at standard 90 PSIG. Pressure dropped from 90 PSIG to 10 PSIG in less than five minutes. The leak crew then removed the riser and installed a dead end cap on service. The leak crew again air tested at 90 PSIG. Again, the pressure on the service dropped from 90 PSIG to 10 PSIG in less than five minutes.

At that point, the leak crew determined there was a leak on the service. The leak truck foreman called Night Supervisor, Larry Westerfield, and informed him that the service line was air tested at 90 PSIG and dropped to 10 PSIG in less than the five minutes standard. He also informed Night Supervisor Westerfield that Systems Control stated the main pressure at that time was 14 PSI. At that time, Night Supervisor Westerfield ordered the leak truck foreman to reinstate the service.

Again, the leak truck foreman reiterated the fact to Night Supervisor Westerfield that the main pressure was 14 PSI and the service, when air tested, dropped from 90 PSIG to 10 PSIG in less than five minutes. Mr. Westerfield ordered that the service be

reinstated. The service was reinstated by the leak crew as ordered by Night Supervisor Westerfield.

It was determined that there was a leak on the service line but not determined where the leak was located or where the natural gas from the leak may have been migrating.

4. R.S.Mo. §386.310.1 empowers and directs the Public Service Commission to require Laclede Gas Company "to maintain and operate its line, plant, system, equipment, apparatus, and premises in such manner as to promote and safeguard the health and safety of its employees, customers, and the public...." Relief in this case is sought pursuant to said statute.

5. Complainant has directly contacted Laclede Gas Company concerning the basis for the Complaint through multiple meetings with Laclede Gas Company representatives as well as through the Public Service Commission's informal complaint process.

WHEREFORE, Complainant requests the following relief: that the Public Service Commission order Laclede Gas Company to cease and desist from reinstating services that may jeopardize the safety of its employees, customers, and/or the public and/or violate duly authorized safety regulations and for such other relief as the Public Service Commission deems appropriate.

Respectfully submitted,

FRANZ & FRANZ, P.C.



WILLIAM M. FRANZ MBE# 30692
10820 SUNSET OFFICE DRIVE
SUITE 350
ST. LOUIS, MO. 63127
(314) 909-8686
(314) 909-0001 (FAX)
ATTORNEYS FOR O.C.A.W.,
AFL-CIO, GAS WORKERS
LOCAL 5-6

STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS) ss

Tom Scheibelhut, being first duly sworn, on his oath and in his capacity as an Officer of Gas Workers Local 5-6 for said entity, states that he: (1) is authorized to execute on behalf of O.C.A.W., Local 5-6, this Verified Complaint; and (2) has knowledge of the matters stated in such Complaint and that said matters are true to the best of his knowledge, information, and belief.

Tom Scheibelhut
Tom Scheibelhut

STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS) ss

On this 15th day of May, 1998, personally appeared before me Tom Scheibelhut, who has executed the Verified Complaint before me a Notary Public, and said party acknowledged the same to be his/her own free act and deed.

MICHELE MESKIL
NOTARY PUBLIC STATE OF MISSOURI
ST. LOUIS COUNTY
MY COMMISSION EXP. SEPT 29, 1998

Michele Meskil
Notary Public

My Commission Expires: _____

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was deposited in the U.S. mail, postage prepaid, on this 1st day of May, 1998, addressed to:

Gerald T. McNieve, Jr.
Vice President
Associate General Counsel
Laclede Gas Company
720 Olive St., Ste. 1528
St. Louis, MO 63101

Michael C. Pendergast
Assistant General Counsel
Laclede Gas Company
720 Olive St., Ste. 1530
St. Louis, MO 63101

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Michael Mestel

RECEIVED

MAY 1 1998

U.S. DEPARTMENT OF JUSTICE
OFFICE OF THE ATTORNEY GENERAL