

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Staff of the Public Service Commission)	
of the State of Missouri,)	
)	
Complainant,)	
)	<u>Case No. GC-2006-0318, et al</u>
v.)	
)	
Laclede Gas Company,)	
)	
Respondent.)	

STAFF’S ADDITIONAL COMMENTS

COMES NOW the Staff of the Missouri Public Service Commission, by and through the Commission’s General Counsel, and for its Additional Post-Hearing Comments, states:

1. On November 28, 2006, the Commission considered the non-unanimous Stipulation and Agreement (S&A) currently pending herein at its regularly-scheduled Agenda session. Among other comments was one to the effect that the Commission would approve the S&A, while holding the penalty aspect of this case in abeyance for three years as a guarantee of Laclede’s good behavior, much as a criminal defendant might receive a Suspended Imposition of Sentence (SIS) and probation.

2. Staff suggests that, should the Commission decide to adopt the concept described above, then the conditions listed below should be imposed on Laclede in order to enable Staff to better monitor Laclede’s performance during the term of its “probation”:

a. Laclede must provide consumer complaint responses in more timely fashion, as follows:

(1) Laclede shall provide responses on disconnect and denial of service complaints within 1 business day.

(2) Laclede shall provide responses on all other consumer complaints within 5 business days.

(3) Laclede shall provide, on all complaint responses, the Statement of Account with the resolution form.

b. Laclede shall provide to Staff and OPC a monthly status report on its AMR installation project.

c. Laclede shall provide to Staff and OPC, on a monthly basis, the number of estimated bills issued, broken down by increments of 3, 4, 5, 6, 7, 8, 9, 10, 11, and 12 consecutive months of estimated billing.

d. Laclede shall provide, on a monthly basis, all call center performance reports currently being submitted on a quarterly basis.

e. Laclede shall provide quarterly internal strategies and objectives for improving the call center performance and customer service.

3. If the foregoing conditions are adopted as safeguards, Staff believes that the proposed resolution would make whole the injured consumers, impose an adequate penalty for Laclede's violation of the Commission's rules, and safeguard the public interest.

WHEREFORE, Staff prays that the Commission will impose the above-listed conditions upon Laclede Gas Company in the event that it determines to approve

the now-pending Stipulation and Agreement and hold the penalty portion of this case in abeyance.

Respectfully submitted,

/s/ Kevin A. Thompson

Kevin A. Thompson
Missouri Bar No. 36288
General Counsel

Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102

573/751-6651
573/751-9285 (fax)
kevin.thompson@psc.mo.gov

Attorney for the Staff of the Missouri
Public Service Commission.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing pleading was served on all parties of record on this **28th day of November, 2006**, by hand-delivery, email, telefacsimile, or First Class United States mail, postage prepaid.

/s/ Lera Shemwell