

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

Gwenda Allen,)	
)	
Complainant,)	
v.)	Case No. GC-2007-0007
)	
Laclede Gas Company,)	
Respondent.)	

**LACLEDE GAS COMPANY'S
RESPONSE TO MOTION FOR STAFF INVESTIGATION**

COMES NOW Laclede Gas Company ("Laclede" or "Company"), and submits this Response to Motion for Staff Investigation, and in support thereof, states as follows:

1. On August 31, 2006, the Commission issued its Notice of Pending Dismissal to Complainant, based on deficiencies in Complainant's complaint. On September 26, 2006, Staff requested that the Commission order Staff to investigate this matter and order Laclede to respond to the Complaint, rather than dismissing it. Staff did not contact Laclede regarding its Motion, but based its request on the fact that Ms. Allen appears to be a low-income customer who received a heating assistance grant pledge in the amount of \$329.21 from the Great Things Incorporated Foundation, and had a balance in 2003 of \$1574.70.

2. Laclede believes that this customer is aware of, and has availed herself of, adequate resources for assistance in maintaining gas service. During the past year, she in fact received the benefit of the grant from Great Things Incorporated of \$329.21, along with funding from Dollar-Help. In addition, Ms. Allen has also received an ECIP pledge,

and once those funds are received, her balance will be in the \$400 range. As another winter approaches, she will again be able to avail herself of these means of assistance.

3. Regarding Commission resources, she has enjoyed the benefit of Staff intervention in the informal complaint process and, as she has done in the past, beginning November 1, she will be able to take advantage of the recently amended Cold Weather Rule.

4. Ms. Allen should be permitted to decide whether she wishes to further pursue a complaint. To that end, Laclede would note that it appears Ms. Allen may have moved from the address at which she filed the complaint and has been receiving notices, 4540 Lexington. In May 2006, Ms. Allen began receiving gas service at

3228 W. Milton Avenue
St. Louis, MO 63114

Laclede suggests that, rather than open an investigation or require the company to respond to a deficient complaint, the Commission reissue notice to the customer at the above address on Milton Avenue.

WHEREFORE, Laclede respectfully requests that the Commission deny Staff's Motion and reissue notice to the alternate address provided by Laclede herein.

Respectfully submitted,

/s/ Rick Zucker

Rick Zucker
Assistant General Counsel
Laclede Gas Company
720 Olive Street, Room 1516
St. Louis, MO 63101
(314) 342-0533 Phone
(314) 421-1979 Fax
rzucker@lacledegas.com

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the Complainant, the General Counsel of the Staff of the Missouri Public Service Commission, and the Office of Public Counsel on or before the 3rd day of October, 2006 by United States mail, hand-delivery, email, or facsimile.

/s/ Rick Zucker