

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

Joseph Schneider,)	
)	
v.)	Case No. GC-2008-0159
)	
Laclede Gas Company,)	
)	
Respondent.)	

LACLEDE GAS COMPANY’S ANSWER TO COMPLAINT

COMES NOW Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s November 13, 2007 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Joseph Schneider (“Mr. Schneider” or the “Customer”). In support thereof, Laclede states as follows:

1. Mr. Schneider objects to a gas bill rendered by Laclede covering a period in the first half of 2007 when Laclede’s meter at Mr. Schneider’s home was not functioning (the “subject period”). Mr. Schneider seeks to recover the entire payment of \$414.08, which was the balance on this bill.

2. In response, Laclede states that Rule 10 of its Tariff requires the Company to bill a customer based on estimated usage during a period when a meter fails to register. Mr. Schneider’s usage has been very consistent over the years, and he does not dispute that he used the amount of gas charged. Further, the portion of the bill covering the unmetered gas charge is \$351.06. The remainder of the \$414.08 bill is represented by current charges previously unbilled, along with a small prior balance.

3. Laclede is without information or belief to respond to the customer’s allegations as follows, and on that basis denies them:

A. That Mr. Schneider was out of town when the bill was paid;

B. That his daughter, Jane, paid the bill and didn't know what it was for;

C. That if Mr. Schneider had been in town he wouldn't have paid the bill.

4. Laclede denies that it made a mistake in this case.

5. Laclede admitted it received and cashed checks sent in by the customer between March and June 2007. Three of these checks were for \$13.11 on bills that reflected no usage based on the non-functioning meter. Laclede believes that Mr. Schneider has sufficient experience and information to know that he actually used gas during these months. By seeking a refund of \$414.08, Mr. Schneider seeks to avoid paying for unmetered gas that he doesn't dispute using, and for other gas that was previously unbilled.

6. The automated meter reading (AMR) technology being installed on Laclede's meters will allow Laclede and its AMR provider, CellNet, to recognize stalled meters sooner than it had in the past. Laclede and Cellnet have coordinated to quickly identify a stalled meter and have committed to promptly resolve the problem.

7. Laclede denies each and every allegation in the complaint not admitted herein.

WHEREFORE, Laclede respectfully requests that the Commission accept Laclede's Answer and find that the Company has violated no laws, or rules, decisions or orders of the Commission in this case.

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 14th day of December, 2007 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch