BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Daniel J. Sebelski,	)	
	)	
Complainants,	)	
v.	)	Case No. GC-2008-0237
	)	
Laclede Gas Company,	)	
Respondent.	)	

LACLEDE GAS COMPANY'S ANSWER

COMES NOW Laclede Gas Company ("Laclede" or "Company"), pursuant to the Commission's January 24, 2008 Notice of Complaint in the above captioned case, and submits its Answer to the complaint filed against Laclede by Mr. Daniel J. Sebelski. In support thereof, Laclede states as follows:

1. In his complaint, Mr. Sebelski objects to receiving a bill of $323.86 for service in June 2007. He requests that Laclede remove this charge from his June bill. He also objects to an adjustment of the amounts originally charged on bills prior to June 2007, because those bills reflected actual readings. In response, Laclede agrees that Mr. Sebelski did not use $323.86 worth of gas in June 2007. The June bill was based on a faulty AMR meter reading. A subsequent manual meter reading performed in connection with re-programming of the AMR module indicated that previous usage had been underbilled, but not to the extent indicated by the June 2007 reading. Laclede reversed the June 2007 charge and, in accordance with its tariffs, rendered an adjusted bill that allocated Mr. Sebelski's true usage in a manner consistent with his normal usage pattern. The result was an increase in Mr. Sebelski's balance of about $200, which Mr. Sebelski has the right to pay over time.

2. In response to specific allegations of fact made in the complaint, Laclede denies the allegation in the first sentence of paragraph 2 that all of Mr. Sebelski's June gas bills have been less than $30 since 2000, when he moved into his house at 5023 McCausland in St. Louis. Laclede's records show that Mr. Sebelski's June 2006 bill was $33.41.

3. Laclede admits that it issued a bill to Mr. Sebelski in June 2007 in the amount of $323.86. Laclede admits that this amount is in error and does not reflect accurate gas usage by Mr. Sebelski for that billing month.

4. Laclede denies that it demanded that Mr. Sebelski pay the full amount of this bill. To the contrary, Laclede reversed this bill and after having the AMR module first reprogrammed and later replaced, re-billed Mr. Sebelski's actual usage over ten months, based on reliable readings from the meter index. Mr. Sebelski paid only the current usage on this adjusted bill, which left a balance remaining on his account of $198.

5. Laclede admits that it explained to Mr. Sebelski that the billing adjustment arose from the fact that he had used more gas than he had been billed for. Laclede admits that the bills originally issued during the adjustment period reflected actual readings. However, these readings were in error, and under Rule 10B of Laclede's tariff, the Company is entitled to issue an adjusted bill to correct these billing errors. Conversely, Mr. sebelski has the right to pay the adjustment over time, in this case, for up to 10 months.

6. In the adjusted bill, the charge for June 2007, originally billed at $323.96, was revised to less than $29.

7. The majority of the increased balance caused by the adjusted bill arose out of the February 2007 billing period. During this unusually cold period, featuring 1,117 Heating Degree Days ("HDDs"), Laclede originally billed the customer for just 41 CCF, or $62.41. In a comparable month, February 2005, Mr. Sebelski used 183 CCF over 923 HDDs. Although the adjusted bill reflected a conservation-oriented use of 161 CCF for February 2007, it accounted, by itself, for $140, or 70%, of the increased balance.

8. The chart below demonstrates how reasonable Laclede's billing adjustment is compared to the original billings for the period ending prior to the June 2007 bill.

Time Period	Gas Used (in CCF)	Heating Degree Days	Usage/HDD
12/8/04 – 5/11/05	572	3254	.1758
12/8/05 – 5/11/06	457	2949	.1550
12/8/06 – 5/11/07 (Original bills)	294	3132	.0939
12/8/06 – 5/11/07 (Adjusted bills)	482	3132	.1539

9. As a final note regarding the inaccuracy of the original 2006-07 billings of 294 CCF over the six months from 12/8/06 to 5/11/07, Mr. Sebelski has already used 306 CCF of gas in just the two months (and 1917 HDDs) since December 10, 2007.

10. In summary, inaccurate readings from the automated device on Laclede's meter resulted in billings of $62 for February and $323 for June. Neither of these bills are correct, and neither should be relied upon by either party. Instead, based on accurate and reasonable readings recorded by the meter index itself, Laclede issued a bill that adjusted the error reads, as provided in Laclede's tariffs.

WHEREFORE, Laclede respectfully requests that the Commission accept Laclede's Answer and find that the Company did not violate any laws, or rules, decisions, or orders of the Commission.

Respectfully submitted,

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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 this 25th day of February, 2008 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch