

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

In the Matter of Herman and)	
Constance Turner,)	
)	
Complainants,)	
v.)	Case No. GC-2007-0281
)	
Laclede Gas Company,)	
Respondent.)	

LACLEDE GAS COMPANY’S ANSWER TO COMPLAINT

COMES NOW Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s January 31, 2007 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Herman and Constance Turner (“Customers” or the “Turners”). In support thereof, Laclede states as follows:

1. The Turners seek to avoid a billing adjustment on their Laclede account for the second floor of 2158 Allen Avenue that reconciled undercharges discovered after a May 2006 actual reading. The Turners also appear to dispute whether they actually used the gas recorded by the meter. The Turners believe that Laclede’s equipment in their building is faulty, leading to unreliable meter readings and requiring repairs.

2. In response, Laclede states that the Turners’ residence at 2158 Allen Avenue in St. Louis has two units and two meters. The remote reading device for the 2nd floor unit stopped working in the fall of 2002. Laclede records indicate that the Company made attempts to access the building or sent correspondence to the Turners in February and September of 2004, in September 2005, and in February of 2006.

3. In May 2006, Laclede finally obtained access to perform a corrosion inspection at the premises. Along with the corrosion inspection, which the premises

successfully passed, Laclede obtained a meter reading which indicated that the Turners had been significantly underbilled. Accordingly, Laclede issued a billing adjustment to adjust for the underbilling. Although the billing adjustment covered only a twelve month period, Laclede will nevertheless confirm that the Turners will receive any benefit due them as a result of the Stipulation and Agreement approved in Case No. GC-2006-0318.

4. Laclede denies that its meter readings are inaccurate or unreliable. Since receiving an actual read in May 2006, all subsequent readings have been consistent, both with the May 2006 reading, and with the Turners assertion that they have minimized usage by not turning on their furnace as of late 2006. Out of five meter readings that were obtained between May and December 2006, the only one that was out of line was a reading of x8106 on 8-1-06. As explained in the Turners' Complaint itself, this reading was actually x9806, which was perfectly in line with the other readings, but was entered incorrectly into Laclede's system as a result of a human error in which the date (8-1-06) was inadvertently entered instead of the meter reading.

5. Further, the meter for the second floor was removed in December 2006, and passed an accuracy test at Laclede's meter shop. The replacement meter is equipped with a new automated meter reading device, and Laclede is continuing to receive regular meter readings.

6. Laclede denies that its equipment is faulty. After Laclede facilities passed the corrosion inspection in May 2006, a follow-up inspection in December 2006 found rust on some of the Company's piping and an order was issued to rectify this condition. This event represents normal maintenance by Laclede as part of its corrosion inspection program, and has no effect on measurement and billing for gas used by the customers.

WHEREFORE, Laclede respectfully requests that the Commission accept Laclede's Answer.

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 28th day of February, 2007 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch