

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

Timothy M. Woodbury,)	
)	
v.)	Case No. GC-2007-0198
)	
Laclede Gas Company,)	
)	
Respondent.)	

LACLEDE GAS COMPANY’S RESPONSE TO REQUEST FOR MEDIATION

COMES NOW Laclede Gas Company (“Laclede” or “Company”), pursuant to the Commission’s January 23, 2007 Order Directing Response to Request for Mediation, and submits its Response, stating as follows:

1. The amount in dispute on Mr. Woodbury’s billing adjustment is just over \$200. Laclede is not currently requesting payment of this amount since it is in dispute. However, Mr. Woodbury owes nearly \$800 more in unpaid, undisputed billings, based on his failure to pay bills in roughly six of the past twelve months. Further, his poor payment history has now triggered a deposit request in accordance with Laclede’s tariffs. Laclede is willing to defer the deposit, but needs to reach an agreement with Mr. Woodbury on a payment plan.

2. In late December, I phoned Mr. Woodbury to attempt to work out payment arrangements, but he steadfastly insisted that he had paid all of his monthly bills. When I asked him to review his checkbook for certain months to see if he had made a payment to Laclede for those months, he declined, claiming that it would be too burdensome. At my request, a Laclede representative telephoned Mr. Woodbury three times between December 28 and January 3 to set up payment arrangements, but got no answer.

3. Mr. Woodbury claims to have financial issues and Laclede has no reason to doubt him. However, Mr. Woodbury refuses to pursue any solutions to these issues, declining to seek heating assistance and avoiding attempts to make payment arrangements. Laclede views the third party mediation requested by Mr. Woodbury as another stalling tactic to avoid facing the bigger issue, which is the unpaid, undisputed balance. Accordingly, before mediation can be considered, Mr. Woodbury should first be required to pay, or enter into a good faith agreement to pay, the undisputed balance, so that he may maintain gas service pending resolution of the dispute. In the course of negotiating such agreement, the parties will also discuss resolution of their dispute, including mediation.

WHEREFORE, in light of the foregoing, Laclede respectfully requests that the Commission issue an order requiring Mr. Woodbury to negotiate an agreement with Laclede on the undisputed balance, which negotiations will include discussions of dispute resolution, including mediation.

Respectfully submitted,

/s/ Rick Zucker

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing Response was served on the Complainant, on the General Counsel of the Staff of the Missouri Public Service Commission, and on the Office of the Public Counsel, on this 26th day of January, 2007 by hand-delivery, email, facsimile or by placing a copy of such Answer postage prepaid, in the United States mail.

/s/ Gerry Lynch