

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

Bridgette Young,)	
)	
)	
v.)	Case No. GC-2010-0248
)	
Laclede Gas Company,)	
)	
Respondent.)	

**LACLEDE GAS COMPANY’S MOTION TO LATE-FILE EXHIBITS AND
MOTION TO ADMIT EXHIBITS INTO EVIDENCE**

COMES NOW Laclede Gas Company (“Laclede” or “Company”), and files this motion to late-file exhibits in this case and to have exhibits admitted into evidence, and in support thereof, states as follows:

1. On August 11, 2010, the Commission issued its Amended Order Setting Procedural Schedule. In the Order, the Commission directed parties attending the hearing in the Wainwright State Office Building in St. Louis to deliver proposed exhibits to the Commission by August 17, 2010.

2. Laclede attended the hearing in St. Louis and provided two exhibits to the Commission by August 17, which exhibits are identified as Exhibits 1 and 2 below. Exhibit 1 has been admitted into evidence. All five exhibits listed below are attached hereto.

- Exhibit 1 – Annual Usage Before and After Service Line Replacement (1 page)
- Exhibit 2 – Annual Amount Billed and Residential PGA Rates (1 page)
- Exhibit 3 – Service Ticket for 08/05/08 gas turn-on (3 pages)
- Exhibit 4 – Letter dated May 17, 2010 from Rick Zucker to Bridgette Young (1 page)
- Exhibit 5 – Letter dated February 19, 2010 from Beverly to Bridgette Young (2 pages)

3. At the hearing on August 18, Laclede also offered Exhibit 3 into evidence, while Complainant Bridget Young offered Exhibits 4 and 5 into evidence. Neither of these three exhibits had been previously submitted to the Commission. Laclede states that it had not intended to offer Exhibit 3, but that it did so as a rebuttal exhibit in response to statements made by Ms. Young at the hearing. Laclede requests the Commission's leave to late file this exhibit and have it entered into evidence.

4. Laclede does not know why Ms. Young did not submit her exhibits prior to the hearing, but upon information and belief, Laclede states that as a pro se complainant, such oversight was likely due to her inexperience with the litigation process. Laclede has no objection to Exhibits 4 and 5 and as an accommodation to Ms. Young, Laclede asks the Commission's leave to late file these exhibits and to have them entered into evidence.

5. Finally, Exhibit 2 was offered into evidence by Laclede, but not admitted, due to Staff's request to review the exhibit. Staff has now represented that it has no objection to the exhibit. Ms. Young did not object to the exhibit at the hearing. Laclede renews its request to have Exhibit 2 admitted into evidence.

WHEREFORE, Laclede respectfully requests that the Commission permit the late-filing of Exhibits 3-5, and admit Exhibits 2-5 into evidence in this case.

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 this 26th day of August, 2010 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch_____

- Exhibit 1 – Annual Usage Before and After Service Line Replacement
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EXHIBIT 1

Bridgette Young
6708 Black Walnut
Acct. 178272-002

Annual Usage Before and After Service Line Replacement

Start Date	End Date	Usage (in ccf)	HDDs	Usage/HDD	Two-Year Average
8/10/2006	8/10/2007	601	4374	0.1374	
8/10/2007	8/8/2008	632	4645	0.1361	0.1367
August 5, 2008 - Service Line Replaced; Service Restored					
8/8/2008	8/10/2009	615	4552	0.1351	
8/10/2009	8/9/2010	676	4499	0.1503	0.1426

Gas Usage Between February - July; 2007-2010

2/9/2007	7/12/2007	230	1351	0.1702
2/11/2008	7/10/2008	229	1701	0.1346
2/9/2009	7/10/2009	191	1365	0.1399
2/8/2010	7/11/2010	221	1355	0.1631

EXHIBIT 2

Bridgette Young
6708 Black Walnut
Acct. 178272-002

Annual Amount Billed

Start Date	End Date	Amt Billed	Usage in CCF
08/10/07	08/08/08	\$993.05	632
08/08/08	08/10/09	\$970.37	615
08/10/09	08/09/10	\$905.77	676

RESIDENTIAL PGA RATES

BLOCKED RATES APPLY DURING THE NOV-APR BILLING MONTHS

(Block 1 = first 30 Therms used)

UNBLOCKED RATES APPLY DURING THE MAY-OCT BILLING MONTHS

TOTAL RATE PER THERM (CENTS PER THERM)

	BLOCK 1	BLOCK 2	UNBLOCKED
Aug. 1, 2007	70.400	94.811	90.497
Nov. 16, 2007	65.356	89.767	85.453
June 19, 2008	86.897	111.308	106.994
Nov. 17, 2008	63.066	87.477	83.163
Nov. 17, 2009	45.141	69.552	65.238

REVIEW ORDER REASON

EXHIBIT 3

(F)ield (R)outed
Grid No. 14771
Date Scheduled
AM PM AL

(D)ispatched:

Office Located
Order No. 080485675 Dist. Area
Account No. 178272-002
Meter No. 1199218
Meter Size 275RL Loc. 03/Amr

SERVICE INFORMATION: Tee - Main 588LL
Curb Box 588LL Riser 3EWAL Service 1NNHL
Branch Service

Leak Information
Leak # Class
Location
Detected Gas:
Source of Gas:

REQUIRED INSPECTIONS:

Name Young, B
Service Address 6708 Black Walnut Ct.
Township St. Louis
Special Inst:
Special Inst:

Cust Phone
Owner/Tenant

JOB DESCR.

TBLG 45051

Neck Rebuild & Right
per CORM. Capless

Ordered By DISPATCH/Reman

OFFICE USE ONLY: Date Taken _____ Time Taken _____ Operator _____
Mailing Address _____ City _____ ST _____ ZIP _____
Meter Sets: Town Code _____ Route _____
Rate _____ Revenue Class _____ Norm _____ Add _____ Tax Code _____
SVC Press _____ Geographic Location _____

() CHECK IF EXTRA FIELD WORK DONE. SEE REVERSE FOR COMPLETED INFORMATION

Main Meter

COMPLETION INFORMATION

Old Meter No. 1199218 New Meter No. _____
Device Number _____ Device Number _____
No. of Dials: 4 No. of Dials: _____
Location: 03/Amr Size: 275RL Location: _____ Size: _____

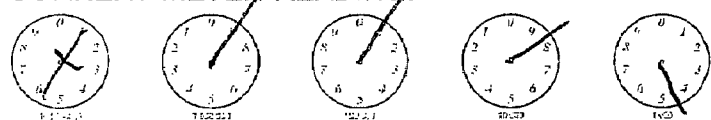
D.R. METER
REPORT

Meter Found DR _____
Device Found DR _____

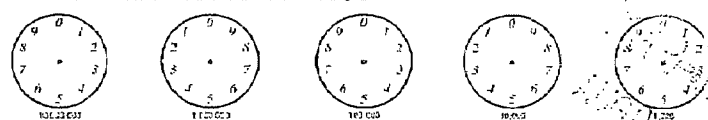
Not DR _____
Not DR _____

NON AMR
☐

CURRENT METER READING:



NEW METER READING:



INDEX READING

Mult

INDEX READING

Mult

Top/Front/Meter _____
Bot/Rear/Device _____
Veeder _____
HIGH/LOW READINGS FROM SYSTEM: Low _____ High _____ Verified ☒

ORDER STATUS ☒ EMPLOYEE NUMBER 6684 DATE COMPLETED 8/5/08
Service Person Signature J. M. Smith
Comment _____

TIME START 1325 TIME COMPLETE 1430

APPLIANCE II INSPECTION			
APPLIANCES	LIT	OK	VENT
RANGE	X	X	X
WATER HTR	LOW <input type="checkbox"/>	NORMAL <input checked="" type="checkbox"/>	HOT <input type="checkbox"/>
SPACE HTR			
CENTRAL RH	2	2	2
DRYER			
AIR COND			
GAS LIGHT			
GRILL			
OTHER			

GAS METER INSPECTION

METER FOUND: On _____ Off X
Locked _____ Off At Curb _____
No Access _____

METER LEFT: On Same Customer X
On New Customer _____ Off _____
Locked _____ Off At Curb _____
Removed _____ No Access _____

Battery: Plugged In _____ Unplugged _____ N/A X
SPOTTED METER X No Access _____

Made 1 %
 in the 0 % Control No. _____
 with 0 %
 Made for inspection (Circle one):
 Inspected Assembled Gas Piping - 0
 in the 0 %

Not Required _____
 Or Reason Not Taken n/r
 Or Reason Not Taken _____
 Or Reason Not Taken _____
 A B C E No Access n/c g/s
 Yes X No Access _____

CONFIDENTIAL

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED

The Liability, if any, of Laclede Gas Company for any and all property damages in connection with the performance of the inspection referred to herein (including, but not limited to, any assertion that anyone is required to pay for any new appliances because of Laclede Gas Company's alleged improper or negligent performance of such inspection) shall in every case be limited to an amount equal to the charges made by Laclede Gas Company for such inspection.

WORKING MEN _____ HRS _____ MIN _____

DATE _____ TIME _____ TOTAL _____

SPRINKLER SYSTEMS AND FIRE ALARM INSTALLATIONS

LESSON to Capt. Fisher - Reservoir - main gate 1/5

TURN ON main gate 1/5 - Ruler Bnls 4 1/2

ASL OK AT THIS TIME

CAS. Back on

DATE _____ TIME _____

REC. CHG. _____ FOREMAN APPROVAL _____

3. The undersigned applies for gas to be served to this address and agrees to use same in accordance with authorized rate schedules, rules and regulations. This contract to remain in force until the customer revokes it by written or verbal notice, given three days in advance of date to be discontinued.

Date Moved In _____
 Date 9/2

3/29/2010 2:37:46 PM

DISPATCH TIME 8/5/2008 13:01:47		Office Located LACLEDE	
Grid 14771C	Dispatcher 08898	Order No. 080485675	Dist. N Area 4
Date Scheduled 8/5/2008	Initials MB	Account No. 178272-002	
Time Pref PM		Meter No. 001199218	
		Meter Size 275RW	Dev/Loc. AR O

SERVICE INFORMATION: Tee 00 Main 05 EECL		Leak Information	
Curb Box 05 EECL	Riser 03 EWHL	Service 01 NNHL	Leak # NO PRIOR Class
Material STEEL	LB FR	Branch Service N	Location
			Detected
			Source

REQUIRED INSPECTIONS

Name YOUNG, BRIDGETT A	Cust Phone 314-524-6186
Service Address 6708 BLACK WALNUT CT	Owner / Tenant OWNER
Township ST LOUIS, MO 63134	Review
Special Inst: C&M COMPLETE, NEED REBUILD & RELITE	
Special Inst: CUST HERE FOR ACCESS	
Follow Up	

JOB DESCR.		TBLG 45		MTR STAT ACTIVE	
Order Description	NO GAS	Location --	ALL APPLIANCES		
	ORDER DESCRIPTION-- NO GAS	LOCATION--	ALL APPLIANCES		
Special C	Leak Control Number	Ordered By	MS YOUNG		
Remarks / ORDH	02/23/06 NEW AMR ON THIS METER				
	//				
	//				
	//				

OFFICE USE ONLY:		Date Taken 8/5/2008	Time Taken 12:43:09	Operator 07956 TELFORD, ANITA
		Town Code 145		
Rate	2RL			
SVC Press	INTERMEDIATE			

ORDER	EMPLOYEE	6684	COMPLETED	TIME START
STATUS C	NUMBER	MINCHER J.	8/5/2008 14:30:01	8/5/2008 13:25:00
Comment	Rblt-gas ison			
Cleared By	08901	Initials	MW	

LACLEDE GAS COMPANY
720 OLIVE STREET
ST. LOUIS, MISSOURI 63101
(314) 342-0533

RICK ZUCKER
ASSISTANT GENERAL COUNSEL-REGULATORY

May 17, 2010

Ms. Bridgette Young
6708 Black Walnut Ct.
St. Louis, MO 63134

Re: Bridgette Young v. Laclede Gas Company; Case No. GC-2010-0248
Laclede Gas Company Account No. 178272-002

Dear Ms. Young:

Pursuant to our discussion last month, I have reviewed your usage history for the February-May period for 2006-2008, the results of which are set forth below:

<u>Date</u>	<u>Reading</u>	<u>Usage in CCFs*</u>	<u>HDD #</u>	<u>Average Use per HDD</u>
02/22/06	x7684	119 ccf	865	.1375
05/11/06	x7803			
02/09/07	x8202	182 ccf	1333	.1365
05/11/07	x8384			
02/11/08	x8837	184 ccf	1630	.1129
05/09/08	x9021			

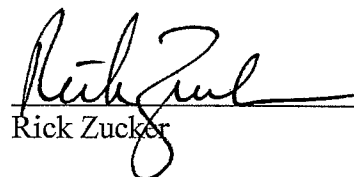
* A CCF is one-hundred Cubic Feet, and is how the meter measures gas usage.

HDD stands for "Heating Degree Day" and represents the amount each day that the average temperature is below 65°. Thus, as temperatures drop, HDDs rise.

As you can see, the usage was consistent over the three year period, with a trend toward conservation, especially in 2008. Nevertheless, at your request, Laclede will remove the meter and test it.

I hope you found Laclede's home energy savings tips valuable. If you have any questions about this information, please do not hesitate to contact me.

Sincerely,


Rick Zucker

RZ:gl

EXHIBIT 5



Commissioners
ROBERT M. CLAYTON III
Chairman

JEFF DAVIS
TERRY JARRETT
KEVIN GUNN

ROBERT S. KENNEY

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.mo.gov>

WESS A. HENDERSON
Executive Director

DANA K. JOYCE
Director, Administration

ROBERT SCHALLENBERG
Director, Utility Services

NATELLE DIETRICH
Director, Utility Operations

STEVEN C. REED
Secretary/General Counsel

KEVIN A. THOMPSON
Chief Staff Counsel

February 19, 2010

Bridgette Young
6708 Black Walnut Court
St. Louis, MO 63134

Dear Ms. Young:

This letter is a follow up to the complaint you filed February 10, 2010, regarding Laclede Gas Company (Laclede) and billing. In your complaint you stated Laclede repaired a leak at your house in 2008. After the repair your gas bill decreased and you believe you should have received a credit. After my initial review of your complaint matter, I contacted the company to obtain additional information. Following is a summary of my review of the issues involved in your complaint.

Laclede records indicate there is no record of a leak at your premise in the last 10 years.

Per our conversation on February 18, 2010, I did check to see if the conversation between you and the Laclede Supervisor was recorded and it was not. However, I did contact the Supervisor, and she again stressed there was no record of a leak at your residence for at least the last 10 years. However, records do show that in August 2009 the Construction and Maintenance Department was renewing the gas service in the area (this involves general maintenance) and your service was turned off while the work was being completed. The service ticket was pulled and there was no documentation of a leak being found.

In addition, there was no documentation of any leaks or any service work of any kind during winter months.

After a review of your account history I was unable to find that your usage has been inconsistent. In fact your usage pattern has been very consistent over the past four years:

- 02/08/10 - 02/2/09 651 Cubic Feet of Gas Used
- 02/09/09 - 2/11/08 646 Cubic Feet of Gas Used
- 02/11/08 - 2/09/07 635 Cubic Feet of Gas Used
- 02/09/07 - 2/22/06 518 Cubic Feet of Gas Used

As indicated by the preceding information I was unable to find that you are due any type of credit due to leaks at this time.

This concludes our investigation of your informal complaint. Receipt of this letter serves as your notice of closure into this matter. If you are dissatisfied with the resolution, it is our responsibility to advise you that under Commission rule 4 CSR 240-13.070 (4), you may file a formal complaint.

For your convenience, please contact us within 31 days from the date of this letter to request a formal complaint packet. The formal complaint process is a quasi-judicial process similar to a civil court hearing, whereby all parties are responsible for presenting their facts to the Commission.

I hope that I have been able to address your concerns. Thank you for contacting our office regarding this matter. If I can assist you further in any way, please do not hesitate to contact me at 1-800-392-4211.

Sincerely,

Beverly
Consumer Services Specialist II
Missouri Public Service Commission