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

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

Respondent.

## LACLEDE GAS COMPANY'S ANSWER TO COMPLAINT

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**COMES NOW** Laclede Gas Company ("Laclede" or "Company"), pursuant to the Commission's March 8, 2010 Notice of Complaint in the above captioned case, and submits its Answer to the Complaint filed against Laclede by Bridgette Young ("Ms. Young" or the "Customer"). In support thereof, Laclede states as follows:

1. In her complaint, Ms. Young states that Laclede denied digging in her yard and that her gas bill is too high. She adds that someone had the same exact problem as her and received a credit on their bill, so she wants to be treated the same and receive a credit too. In her request for relief, Ms. Young asserts that certain companies (presumably including Laclede) are gouging their customers, that she has been overcharged by Laclede, and that mansions in Ladue and Chesterfield have much cheaper gas bills than her. She again asks that her bill be credited.

2. In response, Laclede denies the allegations made by Ms. Young and will explain its position herein. First, Laclede does not deny digging in her yard. However, there was a misunderstanding when Ms. Young first insisted that there had been a gas leak at her home in 2008, and Laclede denied it. In fact, there was a gas leak in 2008 in the general vicinity of Ms. Young's home, but it emanated from Laclede's main under the

street in front of her home. Since records of repairs of this type of leak are not associated with any customer's account, Laclede correctly denied that there had been a gas leak at the home itself.

3. However, Ms. Young is also correct, in that a leak did lead to work on her property. Laclede's records indicate that on the evening of August 3, 2008, a Laclede crew repaired a gas leak in the street where the main connects to the service line serving Ms. Young's home. In addition to remedying the leak, Laclede took the opportunity to replace the bare steel service line with a new plastic service line from the main to the meter, and installed an excess flow valve. Replacing the service line did require the Company to excavate in Ms. Young's yard, so she is correct on that score.

4. The leak at the main would not have had any effect on Ms. Young's gas bills, as any gas that escaped from this leak did so well before it got to the meter just outside her home. Likewise, renewing the service line would not affect the Customer's bill.

5. Laclede denies that Ms. Young has a high bill issue. Her usage has been very consistent over a period of years. For the past four years, she has averaged 613 CCF (hundred cubic feet) per year, which is 30% less usage than Laclede's typical customer. Of course, as her home and gas appliances age, it is possible that her home will use gas less efficiently over time. Laclede customarily provides customers with information on how they can conserve on their energy use and take steps to lower their bills, and will be happy to provide additional information of this nature to Ms. Young.

6. Laclede is without information or belief to state whether someone in Ms. Young's exact situation received a bill credit, and so for purposes of this Answer,

2

Laclede denies it. However, Laclede will be glad to have a representative speak to Ms. Young to gather more information about the matter.

Laclede denies that it gouges its customers, and denies that it overcharged
Ms. Young. Laclede charges customers its tariffed rates, which rates are approved as just
and reasonable by the Commission.

8. Laclede denies that Ms. Young has larger gas bills than mansions in Ladue and Chesterfield. To the contrary, it is Laclede's experience that large properties in these areas have significantly higher usage and billings than the Customer.

9. In the past year and a half, Laclede has manually read the meter at Ms. Young's home three times to ensure that the meter readings match the AMR reads Laclede receives. The meter readings have in fact been consistent with the AMR readings. However, the meter at Ms. Young's home has not been changed recently, and Laclede will offer to change the meter at Ms. Young's request, and test the meter that is currently operating at her home. There is no charge for this service.

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 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

3

## **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 26<sup>th</sup> day of March, 2010 by United States mail, hand-delivery, email, or facsimile.

/s/ Gerry Lynch