

Isabelle Condict  
267 Prince Towne Drive  
St. Louis, MO 63141  
[cissycondict@gmail.com](mailto:cissycondict@gmail.com)

**RECEIVED<sup>4</sup>**

NOV 13 2007

*Records*  
*Public Service Commission*

November 9, 2007

Secretary of the Missouri Public Service Commission  
Attn: Data Center  
P.O. Box 360  
Jefferson City, MO 65102-03610

**FILED**

NOV 13 2007

Re: **Isabelle Condict v. Laclede Gas Company** Missouri Public  
**Laclede Gas Account No: 398014-001-8** Service Commission

Dear Sir or Madam:

Enclosed is an original plus nine (9) copies of the above mentioned Complainant's formal complaint against Laclede Gas Company. Please date stamp the additional copy of the complaint and return in the enclosed self-addressed and stamped envelope.

Please address all future correspondence to my attention at the address listed above.  
Please contact me at 314-496-5923.

Sincerely,

  
Isabelle Condict

cc: MARY CAOLA KULLMAN, registered agent for LACLEDE GAS COMPANY at 720  
OLIVE ST., ST. LOUIS MO 63101

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE  
STATE OF MISSOURI

Name: Isabelle Condict  
Complainant

vs.

Company Name: LACLEDE GAS COMPANY  
Respondent

Case No.

COMPLAINT

Complainant resides at 267 Prince Tower Dr.  
(address of complainant)

St. Louis, MO 63141

1. Respondent, LACLEDE GAS COMPANY  
(company name)

of 720 Olive St. St. Louis MO 63101  
(location of company), is a public utility under the

jurisdiction of the Public Service Commission of the State of Missouri.

2. As the basis of this complaint, Complainant states the following facts:

PLEASE SEE ATTACHED

3. The Complainant has taken the following steps to present this complaint to the Respondent:

Mailed via 1<sup>st</sup> class mail, postage  
pre-paid to

ATTN Mary CAOZA KULLMAN  
LACLEDE GAS COMPANY  
720 OLIVE STREET  
ST. LOUIS, MO 63101

WHEREFORE, Complainant now requests the following relief:

PLEASE  
SEE ATTACHED

11/9/07  
Date

Isabelle Condict  
Signature of Complainant

Attach additional pages, as necessary.  
Attach copies of any supporting documentation.

As the basis of this complaint, Complainant states the following facts:

Respondent has alleged the following:

1. An undercharge for gas consumed to malfunctioning meter, later replaced in May 2006, for a period including but not limited to 9/19/06-5/1/07 (hereafter referred to as "disputed period")
2. Respondent issued complainant a bill for unmetered gas / estimated undercharge for the disputed period.
3. Respondent used the gas consumption for the year preceding disputed period (9/19/05—5/1/06) as its basis for calculating its estimated undercharge amount.
4. Complainant disputes and denies that any undercharge has occurred.
5. Alternatively, if an undercharge is found, Complainant states the following
  - a. The period one-year prior to disputed period (9/19/05 – 5/1/06, hereafter "estimate period") is not an accurate basis upon which to calculate an undercharge, if any.
  - b. My 94 year old mother, who died on April 3, 2006, suffered a severe and debilitating stroke in December 2002, rendering her totally and completely disabled. After discharge, she lived with me at my home and under my care. She required twenty-four hour care from numerous medical providers, including a full time home health care provider. She also required durable medical equipment, requiring energy and daily dressing changes, which required multiple loads of laundry on a daily basis. This significant increase of traffic and use of my home caused a dramatic increase in our household consumption of gas.
  - c. As my mother was 94, frail, confined to my home and disabled, she required the temperature in the house to be high, no less than approximately 76 degrees for 24 hours a day.
  - d. My mother passed away on April 3, 2006. Thereafter, I was able to significantly reduce my consumption of gas. I no longer had to care for my mother's stroke related needs. From this period on, I have been able to turn off my heat while away at work in the daytime and lower the temperature in the evening when I am at home. These cost saving measures were not available to me while my mother was alive.

- e. Accordingly, if an undercharge is found for the disputed period (existence of same is denied by complainant) the estimate period of 9/19/05 through 5/1/06 is not a valid basis for Respondent's estimated calculation of an undercharge, for reasons stated above.

WHEREFORE, Complainant now requests the following relief:

1. A declaratory judgment declaring Respondent's estimated undercharge invalid, null and void.
2. Alternatively, if an undercharge is found, a period other than 9/19/05-5/1/06 be used to estimate the amount owed. Namely, the period of 9/19/07—5/1/08, as it more accurately reflects the current usage and has the benefit of a recently replaced / new meter.
3. An Order staying payment of estimated amount owed for alleged undercharge, pending resolution of dispute.
4. All other relief deemed fair and equitable by this Commission.

  
ISABELLE CONDUCT

Dated: November 9, 2007