

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

In the Matter of)	
Janice Shands,)	
Complainant,)	
v.)	<u>File No. GC-2015-0045</u>
)	
Laclede Gas Company,)	
)	
Respondent)	

RESPONSE TO SUPPLEMENTAL MEMO/MOTION

COMES NOW Laclede Gas Company (Laclede or Company) and, as its Response to Complainant's Supplemental Memo/Motion filed on December 12, 2014, states as follows to the Missouri Public Service Commission (Commission):

1. After discussions in the prehearing conference, Complainant filed on December 12, 2014, a pleading entitled "Complainant's Supplemental Memo/Motion" (12/12 Supplemental Memo). That pleading referenced and provided a copy of a "Plaintiffs' Motion to set aside and amend order dismissing LaClede Gas and MAWC and confirming request for findings of fact and conclusions of law" filed on December 2, 2014, in St. Louis County Circuit Court Case No. 14SL-CC02207.

2. This pleading references the attached "Order Granting Defendant Laclede Gas Company's Motion to Dismiss Plaintiffs' Third Amended Petition" (**Appendix A**), which was issued by the St. Louis County Circuit Court on November 21, 2014. That Order specifically stated, in part, as follows:

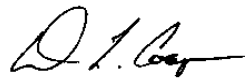
"... the Public Service Commission has the primary jurisdiction to hear Plaintiffs' claims against Laclede Gas Company. Laclede Gas Company's motion to dismiss is GRANTED and Plaintiffs' action against Laclede Gas Company's is DISMISSED. This dismissal is without prejudice to the parties' appeal of a Public Service Commission decision or enforcement action on a decision of the

Public Service Commission, made pursuant to the statutory provisions providing therefor.””

3. The Staff has previously moved to dismiss this complaint based on the fact that Complainant Janice Shands is not the customer of record with Company. Laclede does not object to such a dismissal. However, Company asks that any such order that may be issued by the Commission for this purpose be based upon a question of standing, rather than jurisdiction. As stated previously, the issues raised by the facts alleged in the Complaint concern customer identification, customer responsibility for bills, and the propriety of the bills themselves. These are matters that must be examined in light of the Company’s tariffs, are squarely within the primary jurisdiction of this Commission, and could be addressed by the Commission, given the appropriate parties.

WHEREFORE, Laclede Gas Company prays the Commission consider this Response and grant such relief as the Commission deems reasonable and just.

Respectfully submitted,



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ATTORNEYS FOR LACLEDE GAS COMPANY

Certificate of Service

I hereby certify that copies of the foregoing have been transmitted by electronic mail to the following on this 14th day of December, 2014:

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