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January 11, 2001

FILED

JAN 12 2001

**Missouri Public
Service Commission**

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
P. O. Box 360
Jefferson City, Missouri 65102

Re: Palmyra R-I School District v. United Cities Gas Company
Our File No. 01-006

GC - 2001 - 386

Dear Mr. Roberts:

Enclosed herewith is the original and eight copies of our Complaint. We request that the original of said Complaint be filed before the Commission.

Please advise if you need any further documentation from our office.

A copy of this letter and of this Complaint has also been mailed to the Respondent at the address we received from the Commission.

Thank you for your attention to this matter.

Very truly yours,

**WASINGER, PARHAM, MORTHLAND,
TERRELL & WASINGER, L.C.**

By


John B. Morthland

JBM/pd
Enclosures
cc: United Cities Gas Company
Mr. Jim Lowe

FILED

BEFORE THE PUBLIC SERVICE COMMISSION OF THE JAN 12 2001
STATE OF MISSOURI

PALMYRA R-I SCHOOL DISTRICT,)
Complainant,)

Missouri Public
Service Commission

v.)

Case No. GC - 2001-386

UNITED CITIES GAS COMPANY,)
Respondent.)

COMPLAINT

Complainant resides at 1723 South Main Street, Palmyra, Marion County, Missouri.

1. Respondent, United Cities Gas Company, of Brentwood, Tennessee, 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: Complainant has been charged by Respondent for natural gas provided to Complainant and Complainant has timely paid those bills and statements sent to it by Respondent. Complainant has now learned from Respondent that there has purportedly been a billing error made by Respondent whereby the Complainant, as well as numerous other industrial and commercial clients in the Palmyra District, were undercharged for natural gas provided to them. This "mistake" was purportedly made by Respondent at its home office. Respondent is now attempting to recover from Complainant approximately Five Thousand Dollars (\$5,000.00) for the aforesaid undercharges.

3. The Complainant has taken the following steps to present this Complaint to the Respondent: Complainant, through its Superintendent of Schools, Dr. James Lowe, has discussed the issue over the phone twice with various representatives of Respondent. In addition, on December 20, 2000, Complainant and representatives of the City of Palmyra, Missouri, and Marion County, Missouri, met in person with representatives of the Respondent and were not able to satisfactorily conclude and resolve the dispute.

WHEREFORE, Complainant now requests the following relief: That the Missouri Public Service Commission determine and find that the Respondent cannot recover the sum of approximately Five Thousand Dollars (\$5,000.00) from Complainant as and for the purported undercharges and for its costs and attorney's fees and for such other and further relief as this Commission may deem just and reasonable.

Respectfully submitted,

By 

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ATTORNEY FOR COMPLAINANT

Dated:  Jan. 11, 2001