

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

FILED³

JAN 15 2015

**Missouri Public
Service Commission**

Case No. GC-2015-0111

Cloris and Ronald Torrey)
)
)
v.)
Laclede Gas Company)
)
)

**COMPLAINANT'S AFFIDAVIT REPLY IN OPPOSITION TO
LACLEDE GAS RENEWED MOTION TO DISMISS**

1. Come now the Complainant in Reply to Laclede Gas Company's Responses to Complainants' December 29 Pleading. Cloris and Ronald husband and wife owners of the property located at 9422 Westchester Drive Jennings Missouri 63136. Complainants states as follows:
2. Laclede Gas certified in its response to Complainants complaint of December 29, 2014 Pleading that a true and correct copy of the foregoing pleading was served on Complainants on January 7, 2015. Laclede served no such response document on Complainants, in fact not until January 8, 2015 was document envelope postmark. (See Exhibit A).
3. On December 29, 2014, Complainants sent written notification to Laclede as Consumers of Natural Gas which was not in default of payment, that Complainants were no longer customers of Laclede Gas and requested that gas service be terminated or disconnected. This result after "Final Notice" of December 20, 2014 and December 26, 2014 attempts to enter Complainants premise. Threats of disconnection and allegations that Laclede must perform a safety inspection of its inside piping by December 31, 2014.
4. The December 18, 2014 Declaration of Robert R. Leonberger's Affidavit was not supported by competent and substantial evidence. No exhibit attached to affidavit that indicates Laclede owned the equipment at Complainants resident, that piping and equipment was indeed last inspected on October 27, 2011 to comply with 4 CSR 240-40.030 (9) (Q). There was no public inspection schedule or data attached that would specific specification that Laclede must perform a safety inspection of its piping by December 31, 2014.

5. Laclede violated by attempting on two occasions to enter Complainants premise where no indication of any problems existed. Complainant's sufficient allegations, that Laclede wanted to gain access to premise is purely conspiracy political conflict of interest with the City of Jennings and Bryan Cave Attorneys. Notice, that the Court system have enjoined with Bryan Cave Lawyer's by shields our compliant from the normal course of due process and deny our rights to a speedy trial, which due process call for an answer from Bryan Cave Lawyers relative to our complaint after being duly served.

6. The PSC has no Jurisdiction to involve itself with the Merits which stands unresolved. Laclede Gas interest is personal gain and it should not be using unfounded allegations of Final Judgment as a defense for its unlawful activities to gain entry to our property.

7. Laclede's Response should be stricken from the records and judgment should be entered in favor of the Complainants.


AFFIDAVIT OF CLORIS TORREY

STATE OF MISSOURI)
COUNTY OF ST. LOUIS)

Before the undersigned authority this day personally appeared Cloris Torrey, Complainant being first duly sworn on oath:

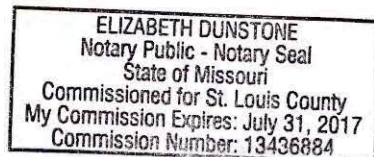
Says the foregoing is just and true statement that such matters true to the best of her knowledge and belief.

Respectfully Submitted:



Cloris Torrey
9422 Westchester Drive
St. Louis, MO 63136

Subscribed and sworn before me on this 12 day of January 2015




Notary Public
State of Missouri

My Commission Expires: 7-31-2017

EXHIBIT AA

CERTIFICATION OF SERVICE

I Cloris Torrey, certify that on January 12, 2015 true and correct copies of the foregoing were served facsimile, by United States Mail and on that date, I served the foregoing to the Laclede Gas Counsel, General Counsel of the Staff of the Missouri Public Service Commission and the Office of Public Counsel.