

Complaint Case Response Form

In the Matter of: Brenda S. Kalemis v. Laclede Gas Company
Case No: GC-2007-0385

Listed below are several statements about your case. These statements come from the answer the utility company gave to your complaint and from the investigation done by the PSC staff. After each statement, you must either check the "true" box or give a reason why the statement, or any part of the statement, is not true. If you need more room to respond to a statement than given by the lines on the form, you may attach additional sheets and note the number of the statement you're continuing to respond to. If you do not mark the "true" box and do not give an explanation why the statement is not true, we will assume that you believe the statement is true.

Laclede Gas Company's Statements. (These statements are in the same order as Laclede Gas Company's numbered responses in its Answer to the Complaint.)

1. Laclede responds that the billing adjustment was made in accordance with its tariffs that specifically address this situation.

☐ This whole statement is true.

This statement is not true because _____

2. On January 9, 2006, an automated meter reading ("AMR") module was installed on Laclede's meter at the customer's home at 1446 Land O'Lakes Drive in St. Louis County.

☐ This whole statement is true.

This statement is not true because _____

3. Following the AMR installation on January 9, 2006, the module continued to send meter readings, but the readings were not advancing, indicating a problem with the AMR module and/or the meter itself.

☐ This whole statement is true.

This statement is not true because _____

4. In late February 2006, Laclede first issued a bill indicating zero usage for the current month.

☐ This whole statement is true.

This statement is not true because _____

5. Laclede caused the AMR module to be replaced on March 31, 2006. However, this did not resolve the issue, so it appeared that a meter change was necessary.

☐ This whole statement is true.

This statement is not true because _____

6. On June 7, 2006, a Laclede representative left a message on the customer's answering machine that a meter change needed to be scheduled due to the meters' failure to register usage. Laclede received no response.

☐ This whole statement is true.

This statement is not true because _____

7. On September 14, 2006, Laclede personnel left another telephone message and mailed a postcard to the customer.

☐ This whole statement is true.

This statement is not true because _____

8. On October 19, 2006, Laclede was able to change the meter and rectify the measurement issue.

☐ This whole statement is true.

This statement is not true because _____

9. Beginning with the February 2006 bill and continuing until the meter was replaced, Ms. Kalemis received bills with charges of less than \$13 per month, based on zero usage, since the meter index was not advancing.

☐ This whole statement is true.

This statement is not true because _____

10. Based on the zero use and the small amounts reflected on each month's billing statements, on the telephone messages and on the postcard, Ms. Kalemis knew or should have known that she was being underbilled.

☐ This whole statement is true.

This statement is not true because _____

11. In accordance with Rule 10A of its tariff, Laclede issued a billing adjustment in November 2006, covering the period December 20, 2005 to October 18, 2006.

☐ This whole statement is true.

This statement is not true because _____

12. In the November 2006 billing adjustment, Laclede credited prior billings during the December 20, 2005, to October 18, 2006 period and charged for 673 ccf (hundred cubic feet), which was less than the amounts billed for the similar period in the two previous years.

☐ This whole statement is true.

This statement is not true because _____

13. In connection with the November 2006 bill, Laclede also sent the customer a letter informing her of the charge for unmetered usage.

☐ This whole statement is true.

This statement is not true because _____

14. Ms. Kalemis had ample indications that her gas bills were understated and that there was a usage measurement issue that needed to be addressed.

☐ This whole statement is true.

This statement is not true because _____

15. Laclede records show that it visited the property in January 2006, March 2006, and October 2006.

☐ This whole statement is true.

This statement is not true because _____

16. Laclede replaced the meter at the property on October 19, 2006.

☐ This whole statement is true.

This statement is not true because _____

17. Prior to completing the meter replacement, Laclede identified a problem with the customer's furnace, which was rectified.

☐ This whole statement is true.

This statement is not true because _____

18. Laclede first attempted to fix the AMR module, and then made multiple attempts to make arrangements with the customer to change the meter.

☐ This whole statement is true.

This statement is not true because _____

19. Laclede denies the allegation in paragraph 2-6 of the complaint that bills received seemed to change with the seasons. The customer included the gas bills with her complaint. These bills clearly show each month's charge for gas service being in the neighborhood of \$13.

☐ This whole statement is true.

This statement is not true because _____

20. Laclede notes that it received correspondence from the customer in December 2006, but does not show that it received a phone call from the customer at this time.

☐ This whole statement is true.

This statement is not true because _____

21. Laclede confirms that it has not required the customer to pay the disputed balance at this time. However, beginning in December 2006, the customer appears to have unilaterally created and paid a budgeted amount, which amount is not sufficient to cover actual winter bills, but should be sufficient to cover her annual charges.

☐ This whole statement is true.

This statement is not true because _____

22. While the Company believes that this customer understands the billing adjustment for the period when the meter failed to register usage, Laclede is willing to, and will, contact the customer and answer the customer's questions regarding such adjustment.

☐ This whole statement is true.

This statement is not true because _____

23. Laclede will offer the customer payments terms that permit the customer to pay the adjustment amount in installments over the same amount of time covered by the adjustment.

☐ This whole statement is true.

This statement is not true because _____

24. Regarding the customer's requested relief, Laclede denies that the customer should only be responsible for usage recorded after the meter issue was rectified. Rather, the customer should also be responsible for the amount of gas consumption estimated by Laclede, and under the payment terms set forth herein, all as provided for in the Company's tariffs.

☐ This whole statement is true.

This statement is not true because _____

Missouri Public Service Commission Staff's Statements. These statements are from the "FACTS" and "RECOMMENDATION" sections of the Report of the Staff filed on May 16, 2007.)

1. On January 2, 2007, Ms. Kalemis filed an informal complaint with the Consumer Services Department by phone.

☐ This whole statement is true.

This statement is not true because _____

2. Complainant stated that she received a bill for unmetered gas in the amount of \$1,200.

☐ This whole statement is true.

This statement is not true because _____

3. On January 2, 2007, Ms. Kalemis advised that she has paid every bill for years and does not understand how she could owe for un-metered gas.

☐ This whole statement is true.

This statement is not true because _____

4. Ms. Kalemis advised that she paid more last year then she had this year.

☐ This whole statement is true.

This statement is not true because _____

5. On January 9, 2006, a meter reading index of x6784 was obtained by Laclede when an AMR device was installed.

☐ This whole statement is true.

This statement is not true because _____

6. Bills after the installation of the AMR were issued showing zero consumption with the minimum customer charge.

☐ This whole statement is true.

This statement is not true because _____

7. On April 5, 2006, Laclede mailed a post card to Ms. Kalemis advising that company was not obtaining a meter reading and requested that she provide a self reading.

☐ This whole statement is true.

This statement is not true because _____

8. Laclede left messages on Ms. Kalemis' answering machine on June 7, 2006, and September 14, 2006, requesting that she contact the company to schedule a dead meter change.

☐ This whole statement is true.

This statement is not true because _____

9. On September 14, 2006, another postcard was mailed to Complainant advising that a systematic meter change was required.

☐ This whole statement is true.

This statement is not true because _____

10. The meter was changed on October 18, 2006. The removed meter index was x6785 and the new meter was set at an index of x0000.

☐ This whole statement is true.

This statement is not true because _____

11. On November 28, 2006, Laclede issued an adjusted bill for 673 CCfs of unmetered gas service from December 20, 2005, to October 18, 2006. The charge for gas service was \$1,028.18 and, after an adjustment for the previous bills and payments, the remaining balance was \$824.65. The bill also included gas service from October 18, 2006, to November 20, 2006, of 123 CCfs, in the amount of \$172.71, for a total account balance of \$997.36.

☐ This whole statement is true.

This statement is not true because _____

12. On the adjusted November 28, 2006 bill, Laclede advised that a 10-month payment arrangement is available.

☐ This whole statement is true.

This statement is not true because _____

13. Subsequent bills based on AMR readings show continuing usage.

☐ This whole statement is true.

This statement is not true because _____

14. A comparison of the estimated usage for the adjusted bill appears to be reasonable when compared to the Complainant's prior two (2) years' of gas usage for the same period of time. (Please see the Staff Recommendation for these exact amounts.)

☐ This whole statement is true.

This statement is not true because _____

15. The accuracy of the bill is a shared responsibility between the customer and the company. Since the disputed billing is in the winter months, it seems likely that Complainant should have noticed that her bills did not include her gas usage during the winter months.

☐ This whole statement is true.

This statement is not true because _____

16. In re-billing the customer for the energy consumed but not billed, the company is collecting from a customer who benefited from the gas that was used. It is preferable to collect from the customer that used the service rather than allowing the company to "write it off" and have it become an expense to all ratepayers.

☐ This whole statement is true.

This statement is not true because _____

17. Staff has reviewed the usage information and calculation used to determine Complainant's estimated usage and finds the method to be reasonable. Staff found no tariff or rule violations and, therefore, recommends this complaint be dismissed.

☐ This whole statement is true.

This statement is not true because _____

Thank you for responding to these statements. Please return this form to the PSC by no later than July 19, 2007, so that we can continue to work on your complaint. If you do not return this form, we will assume that you do not want to continue with your complaint and it should be dismissed.