

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

FILED

FEB 10 2004

City Ventures, Inc.,
A Missouri Corporation

v.

Laclede Gas Company

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Case No.

Missouri Public
Service Commission

COMPLAINT

Complainant, City Ventures, Inc. is a Missouri Corporation with its principal place of business located at 1836 Gravois in the City of St. Louis, State of Missouri.

1. Respondent, Laclede Gas Company of St. Louis, Missouri (Laclede hereinafter), 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:

a. On or about November 28, 2000, Respondent, at Complainant's direction, closed the account of Complainant for gas service at 928 North First Street in the City of St. Louis (1st Street account). Laclede "final billed" Complainant. and Complainant paid the final bill amount of \$129. This should have closed the 1st Street account as between Laclede and Complainant

b. On or about January 18, 2001, Respondent, at Complainant's direction, closed the account of Complainant for gas service at 315 South 15th Street in the City of St. Louis (15th Street account). Laclede "final billed" Complainant. Complainant paid the final bill amount of \$127.40. This should have closed the 15th Street account as between Laclede

and Complainant

c. On or about August 15, 2000, On or about November 28, 2000, Respondent, at Complainant's direction, opened an account for Complainant for gas service at 1836 Gravois in the City of St. Louis (Gravois account). Laclede then transferred an amount of \$7,995.98 to the Gravois account without explanation or basis in fact.

d. Laclede has continued to add erroneous charges to Complainant's Gravois account.

e. On a least one occasion, Laclede has replaced a defective meter reading index (meter) with another defective meter. The second defective meter was later replaced.

f. Laclede has failed to correct its bill for the faulty reading.

g. Laclede's computer generated statements do not correspond with the handwritten statements for the same period. Both type of statements were provided by Laclede personnel and submitted to this Board.

h. Laclede erroneously has continued to add penalties and interest to the account.

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

a. Complainant's president, Brian Scott Kramer, has made numerous phone calls to Laclede's commercial department without resolution.

b. President Kramer attended an off-site meter testing.

c. President Kramer and corporate counsel met with two representatives of Laclede at the Gravois address for over two (2) hours. The representatives, Ms. Carolyn Thompson and Mrs. Kris Embry, could not agree between themselves what Laclede sought and could not present an explanation that was coherent or logical.

d. After this meeting, President Kramer continued to keep contact with these representatives to no satisfaction or resolution.

e. Complainant further states that it has kept its account current with the exception of disputed amounts.

WHEREFORE, Complainant now seeks relief from the Commission under RSMo §386 and specifically, RSMo §386.650:

1. Proper accounting upon the books of the utility;
2. Removal of overcharges, late fees, penalties and interest; and
3. Reasonable compensation for President Kramer's time expended in this matter; and reasonable attorneys' fees;
4. Such other relief as the Commission may deem just and proper in the circumstances.

9th day of February, 2004



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