

FILED⁴

AUG 04 2005

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

Missouri Public
Service Commission

In the matter of)
)
Paper, Allied-Industrial, Chemical,)
And Energy Workers Local No. 5-6,)
) GC-2005-____
and)
)
Laclede Gas Company)

COMPLAINT

COMES NOW Paper, Allied-Industrial, Chemical, and Energy Workers Local No. 5-6, AFL-CIO ("Local 5-6"), by counsel, and hereby files its Complaint against Laclede Gas Company ("Laclede") pursuant to R.S.Mo. §396.390 and 4 CSR §240-2.070. In support of this Complaint, Local 5-6 states as follows:

1. Local 5-6 is a labor organization that represents for purposes of collective bargaining approximately 1050 of Laclede's employees in "physical" classifications such as production, maintenance, operations, and distribution jobs.
2. The principal place of business for Local 5-6 is 7750 Olive Boulevard, St. Louis, Missouri 63130. The telephone number for Local 5-6 is (314) 721-8448, and its fax number is (314) 721-8789. Local 5-6's electronic mail address is gasworkerslocal@sbcglobal.net.
3. Laclede is a public utility operating under the jurisdiction and oversight of the Missouri Public Service Commission. Laclede's principal place of business is 720 Olive Street, St. Louis, Missouri 63101.
4. On May 10, 2005, Laclede submitted proposed tariff revisions in issue JG-2005-0976. Those proposed tariff revisions became effective thirty days later on June 10, 2005, without comment from Staff.

5. On June 20, 2005, Local 5-6 sought reconsideration of the PSC's tacet approval of the tariff revisions based upon public safety concerns.

6. On P.S.C. MO. No. 5 Consolidated, Fifth Revised Sheet No. R-11, Laclede requested a change to allow remote meter readings to constitute actual meter readings. Laclede has been required to obtain annually an actual inside meter reading from those locations having inside meters. Allowing Laclede to utilize remote readings as actual readings creates public safety concerns. Only two years ago, Laclede required that its meter readers begin wearing detection devices that automatically trigger a service call if, when a meter reader makes an annual inside read, the detection sensor finds natural gas odor. This current, mandatory safety precaution will be lost should the annual readings be abandoned and remote meter readings be allowed to constitute actual, inside meter readings.

7. On P.S.C. MO. No. 5 Consolidated, Sixth Revised Sheet No. R-14, Laclede requested a variance from its practice of conducting a physical inspection of all gas appliances at a customer's house when service is conveyed from one customer to another. Under the revised tariffs, only in the instance where gas has been physically disconnected at premises will an inspection be required upon reestablishing service. Under the proposed tariff, Laclede may continue gas supply to premises if requested by the succeeding customer, thus nullifying the inspection currently made upon a transfer of service from one party to another.

8. Local 5-6 has had conversations with Laclede Gas regarding this matter.

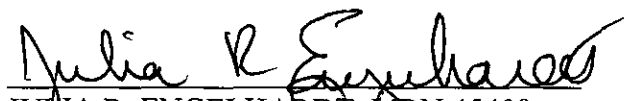
9. Local 5-6 seeks the opportunity to investigate the impact to public safety of the changes to be implemented under the tariff and requests the opportunity to present its findings to the Commission.

10. The Missouri Public Service Commission has jurisdiction over this case pursuant to R.S.Mo. §386.390.1, which allows the Commission to hear complaints brought by any person based upon an action by a public utility.

11. Pursuant to R.S.Mo. §393.130, Laclede Gas, is required to provide safe and adequate service; the actions requested under the tariff revision call into question whether it will fulfill its statutory obligation.

11. Though Local 5-6 is an "association," it does not seem to be the type of association to which 4 CSR 240-2.070(5)(G) is directed. It does not appear to be the intent of that regulatory subsection for Local 5-6 to file a list of all of its members, and Local 5-6 hereby respectfully requests a waiver of complying with said requirement. Should this Commission determine that Local 5-6 must comply with the subsection, the required list will be tendered immediately.

Respectfully submitted,



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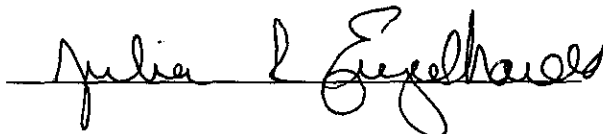
Attorneys for Paper, Allied-Industrial
Chemical, and Energy Workers Local
No. 5-6, AFL-CIO

Certificate of Service

1st The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, this day of August, 2005, postage pre-paid to:

Secretary of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Michael C. Pendergast
720 Olive Street
St. Louis, MO 63101

A handwritten signature in cursive script, reading "Julia L. Engelhaus", written over a horizontal line.