

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

USW Local 11-6)	
)	
Complainant,)	
)	
v.)	
)	
Laclede Gas Company,)	Case No. GC-2006-0390
)	
)	
Respondent.)	

STAFF'S SUBMISSION OF JIM JOHNSON DEPOSITION TESTIMONY

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully submits as follows:

1. The relevant parts of Jim Johnson's testimony from his deposition, taken January 19, 2007 are as follows and are attached hereto:

- p. 11, line 23 through p. 12, line 2
- p. 18, line 20 through p. 20, line 10
- p.31, line 1 through p. 33, line 16
- p. 70, line 14 through p. 73, line 2
- p. 73, lines 1-24
- p.. 80, lines 12-16
- p. 82, lines 4-9
- p. 104, line 23 through p. 105, line 12

p. 120, line 22 through p. 121, line 12

p. 123, line 16 through p. 124, line 6

p. 172, line 24 through p. 173, line 1

p. 173, lines 2-23

WHEREFORE, Staff respectfully submits the relevant parts of Jim Johnson's deposition.

Respectfully submitted,

/s/ Robert V. Franson

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 29th day of January, 2007.

/s/ Robert V. Franson

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[1] Q: BIT is the name of the school?
[2] A: Right, Basic Institute of Technology.
[3] Q: Where is that located?
[4] A: It was down -- at the time, it was Shaw and
[5] Vandeventer, right around that area, the city.
[6] Q: What type of courses did you take there?
[7] A: Heating and air conditioning or
[8] refrigeration.
[9] Q: So, did you learn to work on furnaces and --
[10] A: Yes.
[11] Q: -- air conditioners?
[12] A: Yes, sir.
[13] Q: Have you taken any other courses besides
[14] those?
[15] A: I've taken a sheet metal class, sheet metal
[16] at South County Tech.
[17] Q: When did you take that?
[18] A: I took that since I've been employed at
[19] Laclede, maybe '87, '88, somewhere around in there.
[20] Q: What was the subject matter of that class
[21] besides sheet metal?
[22] A: That's all it was, just sheet metal, working
[23] with sheet metal, bending sheet metal, making, you
[24] know, ductwork.
[25] Q: Oh, it's for ductwork?

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[1] A: Yeah.
[2] Q: Did you learn anything about other types of
[3] metals while you were in that class?
[4] A: No, just sheet metal.
[5] Q: Have you taken any courses relating to iron
[6] or steel?
[7] A: No.
[8] Q: Do you understand the properties of iron and
[9] steel?
[10] A: No.
[11] Q: Have you taken courses regarding minimum
[12] federal standards for gas safety?
[13] A: Anything -- are you -- well, can I ask you
[14] are you referring to like a Laclede safety program?
[15] Q: Let's talk about ones outside of Laclede
[16] first. Have you taken any outside of Laclede?
[17] A: No.
[18] Q: At Laclede, have you taken some courses with
[19] regard to federal pipeline safety regulations?
[20] A: I take a class every year, qualification
[21] class, annual qualification.
[22] Q: Have you taken courses regarding natural gas
[23] incident investigations?
[24] A: Explosions, is that what you mean?
[25] Q: Yes. Well, any type of -- any type of

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[1] natural gas incident, whether --
[2] A: Right.
[3] Q: -- it can be an explosion?
[4] A: Yes.
[5] Q: You have taken some courses in that. Have
[6] those been at Laclede Gas Company?
[7] A: Laclede Gas.
[8] Q: Have you taken courses regarding
[9] installation of gas meters?
[10] A: At Laclede.
[11] Q: Have you taken courses regarding --
[12] MS. SCHRODER: Wait, wait, wait. Was that a
[13] yes or a no?
[14] THE WITNESS: Yes.
[15] MR. ELBERT: Thank you, Sherrie.
[16] Q: (By Mr. Elbert) Have you taken courses
[17] regarding the maintenance of gas meters at Laclede?
[18] A: Yes.
[19] Q: Have you taken courses regarding the
[20] installation of AMR devices at Laclede?
[21] A: Yes, just plugging the battery in, that's
[22] the only course I have.
[23] Q: All right. Have you ever learned how to
[24] actually install an AMR device?
[25] A: If I can ask you, the device itself?

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[1] Q: Yes, the device itself.
[2] A: No.
[3] Q: And just so there's no misunderstanding, do
[4] you know what an AMR device is?
[5] A: Yes.
[6] Q: That's an automatic meter reading device?
[7] A: That's -- yes.
[8] Q: Have you received any types of awards for
[9] industrial safety?
[10] A: No.
[11] Q: Have you received any awards or honors of
[12] any kind in connection with your job?
[13] A: No.
[14] Q: Have you ever done any studies on AMR
[15] devices?
[16] A: No.
[17] Q: Have you ever done any studies on gas
[18] safety?
[19] A: Yes.
[20] Q: Okay. Tell me about those.
[21] A: At Laclede.
[22] Q: Where you actually performed a study?
[23] A: On -- I was studying that.
[24] Q: Oh, okay. I'm sorry, the question was
[25] confusing. What I'm asking you is whether you have

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(1) Q: It wasn't even showing one percent?
(2) A: No, sir
(3) Q: Is it unusual if the -- well, if you hold a
(4) device up to the meter, right up to the meter, is it
(5) unusual if there is a leak to get a reading as high
(6) as 25 percent?
(7) A: No.
(8) Q: Did you consider that to be a dangerous
(9) situation?
(10) A: I didn't have explosive readings, you know,
(11) where you'd be, you know, one percent -- over -- one
(12) percent or over, you know, and I didn't consider,
(13) you know, where we needed to evacuate or anything
(14) like that considering we got a leak on a meter.
(15) Q: Right. Because if you had had a serious
(16) leak there, you would have had to evacuate the
(17) building; right?
(18) A: If I would have had one percent or over in
(19) the open air, we would have been leaving.
(20) Q: And you didn't have that?
(21) A: No, sir.
(22) Q: And you did a thorough check to make sure;
(23) right?
(24) A: Yes, sir.
(25) Q: How far was the entrance to the basement

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(1) from the meter?
(2) A: Not even five feet, six feet. Six feet
(3) maybe. Are you talking about the double door?
(4) Q: No.
(5) A: The top entrance?
(6) Q: The top entrance.
(7) A: Top entrance. Oh. Oh, it's 30 -- 30 -- 30
(8) feet.
(9) Q: So, you could smell the gas 30 to 40 feet
(10) away?
(11) A: Up top.
(12) Q: Up top, but it wasn't even a one percent
(13) reading anywhere?
(14) A: Not in the open air, no.
(15) Q: In the open air?
(16) A: You could smell gas though.
(17) Q: Yeah, okay. On your order form, and you --
(18) can you tell me what percentage you wrote down on
(19) the back? Does it say you found --
(20) A: Twenty.
(21) Q: It says you found 20 percent; right?
(22) A: Twenty percent, yes, sir.
(23) Q: And is that what you found?
(24) A: Yes, sir. If that's what I wrote, that's
(25) what I found.

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(1) Q: Okay. Did you feel that you needed to shut
(2) off the gas?
(3) A: It's a commercial account. You wouldn't
(4) normally shut off a commercial account.
(5) Q: Well, did you feel the situation warranted
(6) --
(7) A: No, I didn't have a broken line or didn't
(8) have gas entering the building.
(9) Q: And you didn't have one percent in the --
(10) A: Right.
(11) Q: -- open air; right?
(12) A: Correct.
(13) Q: So, that would not warrant shutting off the
(14) gas, would it? Right?
(15) A: No, right.
(16) Q: Now, I'd like to refer you to Exhibit 2,
(17) Page 1, which is your affidavit, and if you look
(18) down at the third line from the bottom, you stated
(19) that you had a 25 percent reading at the meter. You
(20) see that?
(21) A: Yes, sir.
(22) Q: But, your CIS form says 20 percent, and you
(23) just testified that was the true amount?
(24) A: That's what it says. That's what -- 20, 25
(25) percent, I was just -- you know, I knew it was in

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(1) that range. When I gave this affidavit, you know, I
(2) didn't have any information to say exactly what it
(3) was, because I always write exactly what it is on
(4) this Laclede document.
(5) Q: So, the document is the correct one; right,
(6) 20 percent, not 25 percent?
(7) A: Yes, sir.
(8) Q: You're saying your affidavit's wrong;
(9) correct?
(10) A: Yes.
(11) Q: And you also said here that this was -- any
(12) gas leak so close to the boiler is particularly
(13) dangerous?
(14) A: Yes.
(15) Q: What do you base that statement on?
(16) A: I base it on this being that it was a
(17) two-pound meter, this was not an inches meter, it
(18) was a two-pound set. It was a large meter, it was a
(19) 1,000 iron case meter. Also, it was a confined
(20) area, this boiler room was confined.
(21) Q: But, you just previously testified, if I
(22) understood you correctly, that this was not in your
(23) view a serious leak, because it was less than one
(24) percent in the air; isn't that right?
(25) A: Yes. But, it was --

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[1] Q: -- is that 20 percent of LEL, or is that 20
[2] percent in the air?
[3] A: It's not in the air, it's 20 percent on a 0
[4] to 100 scale. That meter has LEL, and it has 0 to
[5] 100 scale.
[6] Q: So, you were --
[7] A: On the 0 to 100 scale, yes.
[8] Q: Scale, all right. And when you were
[9] standing out -- what does open air mean by the way?
[10] What does it mean, open air, when you're -- in terms
[11] of a gas reading?
[12] A: I would say right in this room here, I would
[13] consider an open air reading would be right about in
[14] the middle of this desk here.
[15] Q: So, when you're talking about -- the reading
[16] you got was right at the -- essentially, right at
[17] the leak; right?
[18] A: Yes.
[19] Q: Okay. When you were standing outside for
[20] that 40 minutes while you were waiting for Elgin to
[21] show up, you were talking to the maintenance man,
[22] did he stay there with you the whole time?
[23] A: Yes.
[24] Q: Was he smoking?
[25] A: No.

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[1] Q: Was anybody smoking there?
[2] A: No.
[3] Q: What were you talking about with him for 40
[4] minutes?
[5] A: Well, he told me he had some handicapped
[6] kid, he's got his -- I asked him what he was doing
[7] working there, he said he works there because he's
[8] got handicapped -- he's got kids that are
[9] handicapped and they work there. He was retired
[10] from MSD I think he said.
[11] Q: Okay. He was an older gentleman?
[12] A: Yes, sir.
[13] Q: Did you ever tell him this was a
[14] particularly dangerous situation?
[15] A: No. I don't try and alarm the public when
[16] I'm out on the job.
[17] Q: And you referred to blowing gas I believe in
[18] your affidavit?
[19] A: Yes.
[20] Q: What kind of sound does blowing gas make?
[21] A: When you can hear it or feel it.
[22] Q: And you could hear --
[23] A: Do both.
[24] Q: You could do both.
[25] MS. SCHRODER: Let him finish his questions,

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[1] please.
[2] Q: (By Mr. Elbert) I have no other questions.
[3] MS. SCHRODER: Oh, you didn't get it right
[4] by the time he asked his last question. I'm just
[5] kidding.
[6] THE WITNESS: I'm bad.
[7] MS. SCHRODER: Robert, do you want to go
[8] next?
[9] MR. FRANSON: I think that would be the
[10] logical order.
[11] MS. SCHRODER: I do, too.
[12] EXAMINATION
[13] QUESTIONS BY MR. FRANSON:
[14] Q: Mr. Johnson, I'm Robert Franson, I'm an
[15] attorney for the staff of the Public Service
[16] Commission. Good afternoon.
[17] A: Good afternoon.
[18] Q: You say that you don't -- when you go out on
[19] calls like this, you try not to alarm the public.
[20] Isn't that what you said?
[21] A: Yes, sir.
[22] Q: Okay. But, you also try to tell the truth
[23] to the public, don't you?
[24] A: Yes, sir.
[25] Q: And was this maintenance supervisor there

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[1] when you were on the phone to Elgin, and tell me was
[2] his name Manglang?
[3] MS. SCHRODER: Yeah, that's his name.
[4] A: I guess that's his name.
[5] Q: (By Mr. Franson) Okay. Was he -- was the
[6] maintenance supervisor -- well, let me ask him, when
[7] you called the Superintendent Manglang, did you do
[8] that on a cell phone?
[9] A: I did it on a Laclede cell phone.
[10] Q: That's a Laclede cell phone issued to you
[11] for your work use?
[12] A: Yes, sir.
[13] Q: Okay. And is that the device you used to
[14] contact Mr. Manglang?
[15] A: Yes, sir.
[16] Q: Was the maintenance supervisor there by you
[17] when you made that call?
[18] A: Yes, sir.
[19] Q: So, is it fair to say the maintenance
[20] supervisor could hear your part of the call?
[21] A: Yes, sir.
[22] Q: Okay. And now have you ever installed an
[23] AMR device as part of your job?
[24] A: Yes, sir, just the -- at Laclede now, the
[25] AMR device comes on the meter already, and I plug in

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(1) the battery.
(2) Q: So, you plugged in a battery, but have you
(3) ever taken a meter without an AMR device and
(4) installed onto that meter an AMR device?
(5) A: No, sir.
(6) Q: Have you ever received any specific training
(7) on -- where you went to a class and you were
(8) informed, "This is an AMR device, this is the proper
(9) way to install it on a meter"?
(10) A: No.
(11) Q: So, is it fair to say it's not part of your
(12) normal duties to install AMR devices on meters?
(13) A: That would be correct.
(14) Q: Okay. Tell me about, to the best of your
(15) ability, the tools that are issued to you and on
(16) your truck when you are doing your job and going out
(17) on service calls.
(18) A: You want to know all the tools I have?
(19) Q: To the best of your ability, yes.
(20) A: I got a whole truck sitting out front there,
(21) it's -- there's like three -- three, four bins full
(22) of them. I carry certain tools in a tray that
(23) Laclede has gave us a list of the different tools
(24) that they pretty much want us to have on us, plugs
(25) in case a lock cock breaks, screwdrivers, 12-inch

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(1) crescent wrench, 14-inch pipe wrench, 10-inch pipe
(2) wrench, my leak detection equipment, my Ranger.
(3) I have a Sensit also, I carry that.
(4) flashlight, and then I have a whole truck out front
(5) out -- no, it's not -- out front with about three
(6) bins full of tools in it, some of the wrenches being
(7) bigger than the ones I carry.
(8) I have a battery powered drill out there, I
(9) have a Hilti drill, I have, oh, numerous tools, curb
(10) keys, probe rod for probing. I don't -- without
(11) standing in front of it and pulling it all out of
(12) the truck, it takes all day to do a tool inventory,
(13) I -- I'd have -- we'd be here all day if I named all
(14) the tools.
(15) Q: But, does that pretty well cover the general
(16) category of tools?
(17) A: Yes.
(18) Q: Okay, thank you. Do you have your testimony
(19) in front of you? If not, could either --
(20) A: Yes.
(21) MS. SCHRODER: He's got it.
(22) Q: (By Mr. Franson) Okay. Have you got it
(23) now, Mr. Johnson?
(24) A: Yes, sir.
(25) Q: Could you turn to Page 4, and when you're

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(1) there, please tell me.
(2) A: I'm here.
(3) Q: Please review Lines 1 through 6, and when
(4) you have done that, please let me know.
(5) A: Okay, I'm done.
(6) Q: Okay. At Line 3, it says, "Laclede service
(7) employees are only equipped with hand screwdrivers."
(8) Do you see that?
(9) A: Yes.
(10) Q: That wasn't exactly accurate, is it? And
(11) what I mean is you've just told us about all these
(12) other tools you have with you; isn't that correct?
(13) A: Yes. Those are -- for the work -- some of
(14) the work I do, those are special issued tools. The
(15) --
(16) Q: Okay. And in fact, up in the question at
(17) Line 2, you asked -- well, let's see how you phrased
(18) this. You've got -- well, you did have power tools
(19) available to you on your truck on November 10, 2006
(20) when you went out to this incident that we're
(21) talking about, didn't you?
(22) A: Yes, sir.
(23) Q: And in fact, you described those just in
(24) some of my earlier questions, in your responses to
(25) some of my earlier questions, didn't you?

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(1) A: Yes, sir.
(2) Q: Okay. And that included power drills,
(3) didn't it?
(4) A: Well, it's a battery powered drill, sir.
(5) Q: But, it's still a powered --
(6) A: Yes.
(7) Q: Okay. Thank you. Now, you testified that
(8) when you were on the phone to the supervisor, who I
(9) believe it was Superintendent Manglang, you were
(10) instructed by the -- by the superintendent to see if
(11) the maintenance man would be okay with turning off
(12) the gas for the weekend; is that correct?
(13) A: That's correct.
(14) Q: And what was the response of the maintenance
(15) man?
(16) A: The maintenance man said -- he says, "Oh,"
(17) he says, "no, it's your job to fix that meter," he
(18) said, "you're not turning off the gas here." He
(19) said, "You need to get somebody out here to fix
(20) this," he said, "or," he said, "my boss," I guess
(21) she's over the building, "is like a direct hotline
(22) to Channel 2 news, and you aren't going to want them
(23) out here," something to that effect, something with
(24) the news media. And --
(25) Q: Did you -- I'm sorry, go ahead.

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(1) nothing to fix that with.
(2) Q: And who did -- did Elgin bring the parts to
(3) fix it?
(4) A: I don't know if he did or not. I think --
(5) to be quite truthful with you, I thought -- before
(6) this came off, I thought the -- the gear, the
(7) wiggler, whatever you want to call it, I thought
(8) that's what was leaking on this thing. And I don't
(9) know if he brought the part to fix something like
(10) that, because I've never been around it, I don't
(11) know. I don't know if he --
(12) Q: Do you know whether those can even be
(13) repaired?
(14) A: I think they can, I hear they can. I've
(15) never seen it.
(16) Q: But, ultimately, you used Permagum to repair
(17) it, right?
(18) A: Yes, sir.
(19) Q: Where did that Permagum come from?
(20) A: Off my truck.
(21) Q: And where did the screwdriver come from?
(22) A: Off my truck.
(23) Q: So, in fact, all the parts came off your
(24) truck to fix this meter, didn't it?
(25) A: This was a temporary repair.

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(1) Q: Is that -- is that a yes or a no to my
(2) question?
(3) A: Yes.
(4) Q: You said the only thing you know about the
(5) Cellnet people is what you've seen on TV?
(6) A: Yes, sir.
(7) Q: So, you don't know what their qualifications
(8) are?
(9) A: No, sir.
(10) Q: And you would agree, as you did before, that
(11) Laclede employees make mistakes; right?
(12) A: Yes, sir.
(13) Q: I'm going to show you what's been marked as
(14) Company Exhibit No. 4, which is a CIS ticket dated
(15) February 7, 2005, and it's signed by -- it's not
(16) something that you've signed. It looks like it's
(17) signed by somebody named Reitmeyer?
(18) MS. SCHRODER: I'm going to object to this
(19) exhibit. It's inappropriate Cross or Redirect or
(20) whatever, Re whatever it is, because none of this
(21) came up when --
(22) MR. ELBERT: This is a deposition.
(23) MS. SCHRODER: -- in the initial -- well,
(24) you did have your initial --
(25) MR. ELBERT: This is a deposition. I can --

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(1) MS. SCHRODER: Well, I'm going to object to
(2) it all the same.
(3) MR. ELBERT: Well, object to it, that's
(4) fine.
(5) MS. SCHRODER: You can do what you want with
(6) it, but --
(7) Q: (By Mr. Elbert) Okay. Have you ever seen
(8) this document before?
(9) A: This one?
(10) Q: Yes.
(11) A: No.
(12) Q: Do you see down on the back side that it
(13) shows that there was a leak in the meter at this
(14) location?
(15) A: It looks like he made a repair and charged
(16) the customer on -- what would he be charging the
(17) customer on?
(18) Q: Well, it says he made a repair on the meter.
(19) Do you see that?
(20) A: I don't know what he'd be charging the
(21) customer for on that.
(22) Q: Well, also, he checked appliances, lit and
(23) checked appliances, tested fuel runs, made repair on
(24) meter. Do you see that?
(25) A: Yes. But, he charged the customer. That's

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(1) our meter.
(2) Q: I can't tell you about that. Do you know
(3) what the nature -- and you don't know what the
(4) nature of that repair was, do you?
(5) A: No, I don't know what it would be charging a
(6) customer, that's our meter.
(7) Q: I'm asking you about the repair to the
(8) meter. Do you know what the nature of the repair to
(9) the meter was?
(10) A: No.
(11) Q: Do you know whether there could have been
(12) holes in the meter at that time?
(13) A: No.
(14) Q: Those red tabs, do you carry those red tabs?
(15) A: Yes, sir.
(16) Q: Does everybody carry those red tabs who's in
(17) the SAID?
(18) A: Yes, sir.
(19) Q: So, you don't know whether anyone tampered
(20) with that meter between the time that the Cellnet
(21) person was there on November 9 and the time that you
(22) arrived on November 10, do you?
(23) A: No, I don't.
(24) Q: And do you know whether anyone used a power
(25) tool on that meter?

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(1) A: No, I don't.

(2) Q: And do you know whether -- the size of the
(3) individual that worked for Cellnet who supposedly
(4) put on that AMR device on November 9?

(5) A: No, I don't.

(6) Q: Do you know -- are you saying that someone
(7) your size at 6'1", how much do you weigh?

(8) A: 210.

(9) Q: 210, do you think you could apply enough
(10) force to one of those bolts to actually make that
(11) meter casing crack?

(12) A: There's no reason for it, there's no reason
(13) to tighten them up like that.

(14) Q: I'm asking whether you could do it
(15) physically?

(16) A: No.

(17) Q: And you consider yourself pretty strong;
(18) right?

(19) A: There's stronger.

(20) Q: Do you consider yourself pretty strong, yes
(21) or no?

(22) A: Yes.

(23) Q: Do you have any idea how long that meter had
(24) been leaking when you arrived?

(25) A: No, other than what -- other than what the

(1) A: Yes.

(2) Q: Would you expected -- would you have
(3) expected to find air -- gas in air of over one
(4) percent?

(5) MS. SCHRODER: Objection on -- never mind.
(6) Go ahead.

(7) MR. ELBERT: I'm giving him the facts that
(8) occurred, Sherrie.

(9) A: There's no telling on those -- on those
(10) things, it's -- how much --

(11) Q: (By Mr. Elbert) You can't tell it in fact.
(12) What we do know is that when you arrived on November
(13) 10 and you were at the highest point at the top of
(14) the stairs, there was no reading; isn't that
(15) correct?

(16) A: That's correct.

(17) Q: So, it's possible, isn't it, sir, that that
(18) gas could have been leaking at the meter for days
(19) without any problem at all, couldn't it? Isn't that
(20) possible?

(21) A: Anything's possible.

(22) Q: Isn't it possible that that level of gas at
(23) the meter at that location could have been leaking
(24) for months?

(25) A: I'll tell you, inside leaks with pounds

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(1) man told me, the maintenance guy said.

(2) Q: And the first time he smelled gas --

(3) A: Would be the next morning.

(4) Q: Was on November 10?

(5) A: Yes.

(6) Q: So, we don't know whether gas was leaking at
(7) the time that the Cellnet person was there on
(8) November 9, do we?

(9) A: No.

(10) Q: And we don't know if somebody else came and
(11) tampered with that meter between the time the
(12) Cellnet employee was there and the time that the
(13) maintenance man came and said he smelled gas on
(14) November 10; right?

(15) A: Right.

(16) Q: You talked about gas buildup. Now, if that
(17) meter was leaking from the moment that the Cellnet
(18) man was there -- do you know what time he was there
(19) on November 9?

(20) A: No.

(21) Q: You don't know whether it was the morning or
(22) the afternoon?

(23) A: No.

(24) Q: And it had been leaking at this 20 percent
(25) level that you found at the meter?

(1) meters, I wouldn't want to be going into months.

(2) Q: Well, is it possible?

(3) A: Everything's possible.

(4) Q: Well, we know that you never found any gas
(5) in the air anywhere in that building, did you?

(6) A: That's correct.

(7) Q: Now, you testified that when RE devices were
(8) installed, sometimes they started -- the leak
(9) started right after they were installed; right?

(10) A: They showed up sometimes.

(11) Q: Yeah. And do you know whether the Union
(12) ever filed a complaint with the PSC complaining that
(13) its Union employee -- that its employees weren't --
(14) that its members weren't properly installing those
(15) RE devices?

(16) A: Not that I know of.

(17) Q: Do you know whether the Union ever sought
(18) discipline of any employees for failure to properly
(19) install those devices?

(20) MS. SCHRODER: Objection, lack of
(21) foundation.

(22) Q: (By Mr. Elbert) You've worked at Laclede
(23) for how many years?

(24) A: Going on 28 now.

(25) Q: And --