

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

In the matter of)	
)	
USW Local 11-6,)	GC-2006-
)	
and)	
)	
Laclede Gas Company)	

COMPLAINT

COMES NOW USW Local 11-6 ("Local 11-6"), by counsel, and hereby files its Complaint against Laclede Gas Company ("Laclede") pursuant to R.S.Mo. §§386.390, 393.130.1 and 4 CSR §240-2.070. In support of this Complaint, Local 11-6 states as follows:

1. Laclede Gas Company 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.
2. Local 11-6 is a labor organization that represents for purposes of collective bargaining approximately 1050 of Laclede's employees in physical plant classifications such as production, maintenance, operations, and distribution jobs.
3. The principal place of business for Local 11-6 is 7750 Olive Boulevard, St. Louis, Missouri 63130. The telephone number for Local 11-6 is (314) 721-8448, and its fax number is (314) 721-8789. Local 11-6's electronic mail address is gasworkerslocal@sbcglobal.net.
4. Employees represented by Local 11-6 install, inspect, read, test, service and change meters at the residences of Laclede's customers.

5. Laclede is implementing an automated meter reading (AMR) program, pursuant to which a device is being installed on each residential meter to electronically and remotely read gas usage on each meter on which it is installed.

6. Laclede has contracted with Cellnet Technology, Inc. (“Cellnet”) for the installation of the AMR device, which is being installed on Laclede's meters by subcontractors of Cellnet and not by Laclede's trained personnel.

7. Upon information and belief, subcontractors of Cellnet are not receiving adequate training prior to installing the AMR devices on the residential meters.

8. Upon information and belief, there have been numerous installations of AMR by Cellnet subcontractors that have resulted in meter damage and gas leaks.

9. Local 11-6 has had conversations with Laclede regarding this matter, to no avail.

10. The Missouri Public Service Commission has jurisdiction over this case pursuant to R.S.Mo. §386.250(1) and (5), which establishes its jurisdiction over public utility commissions and all persons or entities engaged in the manufacture, sale or distribution of gas within the State, and 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. The Missouri legislature has expressly found that gas service is an essential, but “potentially dangerous,” commodity in today’s society. R.S.Mo. §393.297.4.

12. Pursuant to R.S.Mo. §393.130, Laclede is required to provide “safe and adequate” service. The unilateral change in method of installing remote meter reading devices on meters significantly impairs Laclede’s ability to provide safe and adequate service.

13. Pursuant to R.S.Mo. §393.140(2), the Commission is empowered to investigate the “methods employed . . . in . . . distributing and supplying gas. . . and to order such reasonable

improvements as will best promote the public interest, preserve the public health and protect those using such gas,. . . and those employed in the distribution thereof.”

14. Pursuant to R.S.Mo. §386.310.1, the Commission may require Laclede to operate “in such manner as to promote and safeguard the health and safety of its employees, customers, and the public. . . and to require the performance of any. . . act which the health or safety of its employees, customers or the public may demand.”

15. Local 11-6 hereby requests that the Commission order Laclede to, from this date forward, continue the installation of the AMR devices with, or supervised by, its own trained non-managerial personnel to ensure that the devices are installed without damaging the meters or causing gas leaks. Local 11-6 further requests that the Commission order Laclede to have its trained non-managerial personnel promptly inspect each of the meters that has been installed through Cellnet.

16. As a labor organization, Local 11-6 is an unincorporated association. It is apparently not the type of association to which 4 CSR 240-2.070(5)(G) is directed. Since it does not appear to be the intent of that regulatory subsection for Local 11-6 to file a list of all of its members, Local 11-6 hereby respectfully requests a waiver of complying with said requirement. Should the Commission determine that 4 CSR 240-2.070(5)(G) applies to Local 11-6, Complainant will tender the required list immediately.

Respectfully submitted,

/s/ Sherrie A. Schroder

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on April 10, 2006, by United States mail, hand-deliver, email, or facsimile upon:

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