

Exhibit No.:
Issues: Quality of Service
Witness: Robert R. Leonberger
Sponsoring Party: MO PSC Staff
Type of Exhibit: Supplemental Rebuttal
Testimony
Case No.: GC-2006-0390
Date Testimony Prepared: January 29, 2007

MISSOURI PUBLIC SERVICE COMMISSION

UTILITY OPERATIONS DIVISION

SUPPLEMENTAL REBUTTAL TESTIMONY

OF

ROBERT R. LEONBERGER

LACLEDE GAS COMPANY

CASE NO. GC-2006-0390

**Jefferson City, Missouri
January 2007**

Staff Exhibit No. 40
Case No(s). GC-2006-0390
Date 2-26-07 Rptr A

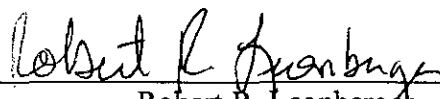
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

AFFIDAVIT OF ROBERT R. LEONBERGER

STATE OF MISSOURI)
) ss
COUNTY OF COLE)

Robert R. Leonberger, of lawful age, on his oath states: that he has participated in the preparation of the following Supplemental Rebuttal Testimony in question and answer form, consisting of 4 pages of Supplemental Rebuttal Testimony to be presented in the above case, that the answers in the following Supplemental Rebuttal Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.



Robert R. Leonberger

Subscribed and sworn to before me this 29th day of January, 2007.



SUSAN L. SUNDERMEYER
My Commission Expires
September 21, 2010
Callaway County
Commission #06942086



Notary Public

My commission expires 9-21-10

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SUPPLEMENTAL REBUTTAL TESTIMONY

OF

ROBERT R. LEONBERGER

LACLEDE GAS COMPANY

CASE NO. GC-2006-0390

Q. Please state your name and business address.

A. My name is Robert R. Leonberger and my business address is P.O. Box 360, Jefferson City, Missouri 65102.

Q. Are you the same Robert R. Leonberger that filed Rebuttal Testimony in this Case?

A. Yes.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to address the Supplemental Testimony filed on January 8, 2007 by USW Local 11-6 witness Mr. Mark Boyle and Direct Testimony filed on January 8, 2007 by USW Local 11-6 witness Mr. Jim Johnson. The testimony filed by Mr. Johnson and Mr. Boyle each contains an account of a gas leak at different addresses to which they responded that allegedly there was a "gas leak involving an AMR device." I have reviewed serviceman reports generated by the odor calls and reviewed depositions of Mr. Johnson and Mr. Boyle that were conducted on January 19 and January 23, 2007, respectively.

Q. Did the above-referenced testimonies or depositions of Mr. Johnson and Mr. Boyle cause you to change your position in this case as detailed in your Rebuttal Testimony filed on November 8, 2006?

Supplemental Rebuttal Testimony of
Robert R. Leonberger

1 A. No. After reviewing their testimonies, records generated by the leak calls and
2 the depositions, my position in this case had not changed. As stated in my Rebuttal
3 Testimony on page 4, lines 5-10, "Therefore, Staff does not believe that the installation of
4 AMR devices by CellNet is in any way a general safety hazard. On the contrary, it may be
5 that safety was increased in the process of installing AMR because there were many occasions
6 where pre-existing gas leaks were discovered due to AMR installation. The Staff believes the
7 installation of an AMR device on existing meters is a simple process for which the installers
8 for CellNet were adequately trained."

9 In fact, Mr. Johnson in his deposition, indicated that during his 27 years of
10 employment with Laclede, he had been involved in the installation of previous generation
11 remote reading devices (described as RE's, ME's, and Trace devices) (Johnson Deposition, p.
12 18, line 20 through p. 20, line 10). Mr. Johnson further indicated that there were leaks
13 reported at locations where these remote reading devices had been installed by Laclede
14 employees that after installation required a Laclede serviceman to respond (Johnson
15 Deposition, p. 31, line 1 through p. 33, line 16). Accordingly, it is apparent that Laclede
16 servicemen being called to respond to a report of a gas leak after the installation of a remote
17 reading device is not limited solely to Laclede's current AMR installation project. There were
18 customer reported leaks that Mr. Johnson responded to at locations after remote reading
19 devices (so called ME's, RE's, and Trace devices) were installed by Laclede personnel. It
20 would therefore not be unexpected to have customer reported leaks during the current project
21 to install AMR devices by CellNet subcontractors.

22 Q. Please discuss the leak encountered by Mr. Johnson on November 10, 2006.

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1 A. Mr. Johnson indicated the leakage he found was coming from the screw/bolt
2 holes attaching the AMR device and the readings obtained were right on top of the meter at
3 the AMR device, not around the meter or in the open air (Johnson Deposition, p. 70, line 14
4 through p. 73, line 2). Even though he stated in his testimony that the leak at this address, due
5 to its location, was "particularly dangerous," (Johnson Affidavit, p.1, line 16) he did not
6 evacuate the developmentally disabled occupants of the building and he stood nearby waiting
7 about 45 minutes for a supervisor to arrive (Johnson Deposition, p. 80, lines 12-16 and p. 82,
8 lines 3-9). In his testimony he stated that he did not believe that the meter had been drilled
9 through, but that the "...screws used to install the AMR device had penetrated the meter
10 casing, thus causing the leak." (Johnson Deposition p. 104, line 23 through p.105, line 12 and
11 Johnson Affidavit, page 3, lines 7-8). In his deposition he stated (Johnson Deposition, p. 173,
12 lines 2-23), that he is six feet, one inch tall and weighs 210 pounds and did not think he could
13 tighten the bolts and penetrate the meter casing. So, it is not clear how the installation of the
14 AMR device the day before the leak call "caused the meter to leak."

15 Q. Please discuss the leak encountered by Mr. Boyle on December 19, 2006.

16 A. In his testimony (Boyle Affidavit, page 1, lines 12-13) Mr. Boyle indicates that
17 the gas leak he found was from a "...union on the piping located about one foot from the
18 meter." The customer told Mr. Boyle that there had been an installation of an AMR device at
19 the residence that same day (Boyle Affidavit p. 2, lines 18-21); however, AMR installation
20 does not involve loosening fittings such as unions. During his deposition (Boyle Deposition,
21 p. 112, lines 11-12) Mr. Boyle stated it was pretty common for unions to leak. Mr. Boyle
22 indicated that there were two people at the address he responded to and he obtained a reading
23 of over 1% natural gas in air inside when he arrived and indicated the leak he encountered

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1 was very serious (Boyle Affidavit, p. 1, lines 6-10; p. 2, lines 1-2). However, Mr. Boyle did
2 not evacuate the people from the residence (Boyle Deposition p. 90, line 25 through p. 91 line
3 2). Mr. Boyle did call the USW Local 11-6 Business Manager with the Laclede cell phone
4 from the residence within minutes of his arrival (Boyle Deposition, p. 92, line 9 through p. 93,
5 line 14).

6 Q. Does this conclude your direct testimony?

7 A. Yes.