

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of)
USW Local 11-6,) GC-2006-0390
Complainant)
and)
Laclede Gas Company,)
Respondent)

FILED

JAN 05 2007

Missouri Public
Service Commission

AFFIDAVIT OF DAVID LAY

STATE OF MISSOURI)
COUNTY OF ST. LOUIS) ss

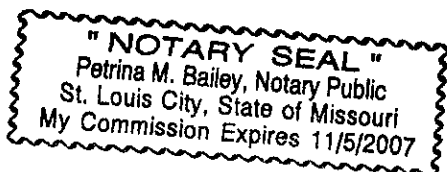
David Lay, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 2 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him; that 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.

David W. Lay
David Lay

Subscribed and sworn to before me this 20th day of Sept., 2006.

Petrina M Bailey
Notary Public

My commission expires _____



USW Exhibit No. 3-NP
Case No(s). GC-2006-0390
Date 2/1/06 Rptr MU

DIRECT TESTIMONY
OF
DAVID LAY
SUBMITTED ON BEHALF OF USW 11-6

LACLEDE GAS COMPANY

CASE NO. GC-2006-0390

1 **Q. Please state your name and address.**

2 A. My name is David Lay and my address is ** ***, St. Louis, MO
3 63128.

4 **Q. What is your current place of employment and how long have you worked**
5 **there?**

6 A. I am currently employed by Laclede Gas Company in the Service Department. I
7 have worked there for twenty years.

8 **Q. Have you held any officer or executive board positions in USW 11-6?**

9 A. No.

10 **Q. What training have you received from Laclede?**

11 A. When starting at Laclede, I attended a two-week training program. I attended
12 classes on leak investigations, operating a combustible gas indicator, how to
13 detect leaks on appliances, and how to repair appliances. Furthermore, I receive
14 ongoing instruction one or two times per year.

15 **Q. Based upon your training, what is your opinion of the dangerousness of gas**
16 **leaks?**

1 A. As a trained gasworker, it is my opinion that any leak, even if minor, is
2 dangerous.

3 **Q. Has an AMR device meter been installed on your home meter?**

4 A. Yes. On January 8, 2006, my neighbors told me that they had smelled gas
5 outside. I went out to inspect the meter and discovered that an AMR device had
6 been installed and a gas smell was emanating from the meter. I assumed that the
7 AMR device had been installed recently because this is the first time I had noticed
8 it.

9 **Q. What did you do next?**

10 A. I called Laclede, and they sent out gasworker Rick Martinez. I stood beside him
11 as he ran his Sensit gas detector, which found a leak on the dial glass. He then
12 replaced the meter with a new one.

13 **Q. Do you have any opinion on the cause of the leak?**

14 A. To my knowledge, the meter did not leak before the AMR installation. However,
15 the leak was discovered the same day I noticed that the AMR device was
16 installed. Furthermore, the dial glass must be removed to install an AMR device.
17 Accordingly, it appears that the leak on the dial glass was caused by the AMR
18 installation.

19 **Q. Does this conclude your direct testimony?**

20 A. Yes.