

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

JAN 05 2007

Missouri Public  
Service Commission

In the matter of )

USW Local 11-6, )

Complainant )

and )

Laclede Gas Company, )

Respondent )

GC-2006-0390

AFFIDAVIT OF MARK BOYLE

STATE OF MISSOURI )

) ss

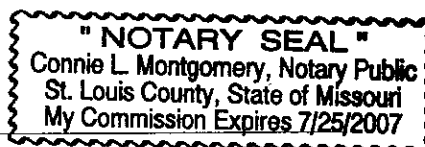
COUNTY OF ST. LOUIS )

Mark Boyle, 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 3 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.

Mark J. Boyle  
Mark Boyle

Subscribed and sworn to before me this 25<sup>th</sup> day of September, 2006.

Connie L. Montgomery  
Notary Public



My commission expires \_\_\_\_\_

USW Exhibit No. 15-NP  
Case No(s). GC-2006-0390  
Date 12/12/06 Rptr MM

**DIRECT TESTIMONY**  
**OF**  
**MARK BOYLE**  
**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 Mark Boyle and my address is \*\*

3 \_ \_ \_ \_ \_ \*\*.

4 Q. Who is your employer and how long have you worked there?

5 A. I am currently employed by Laclede Gas Company and have worked there for  
6 fourteen years.

7 Q. What is your position at Laclede Gas?

8 A. I work in the Service Department. I am a general fitter, which means that I work  
9 on residential, commercial, industrial and institutional piping.

10 Q. Do you hold any officer or executive board positions in USW 11-6?

11 A. I am a shop steward for the northern district and hold a position on the executive  
12 board of the union.

13 Q. What experience do you have with AMR meters?

14 A. I have been called out to repair leaking AMR meters while working in the Service  
15 Department. Upon finding a leaking AMR meter, I replace it with a new meter

1 with a pre-installed AMR device. I then take the old meter back to the North  
2 District. The old meter is eventually taken to the metershop.

3 **Q. After encountering a leaking AMR meter, what would you do with that**  
4 **information?**

5 A. After I have replaced a leaking meter, I fill out a CIS form. This form has spaces  
6 for the customer's name, date, address, meter number, and order number. I note  
7 that there was a leaking AMR device in the blank spaces on the sheet. I also fill  
8 out a meter change ticket that explains why I changed the meter. The meter  
9 change ticket accompanies the meter back to the metershop.  
10 Additionally, I have written down the addresses where I had personally  
11 encountered AMR leaks and turned that information over to the union. I have  
12 also collected the addresses of AMR leaks from other service employees and  
13 given it to the union.

14 **Q. Do any particular AMR leaks stand out in your memory?**

15 A. Yes. On January 20, 2006, a Cellnet installer called in a leak at \*\*.

16 \*\*. Upon arriving at the scene, I found that the meter had been  
17 drilled through in an attempt to install an AMR device, thus causing a gas leak.  
18 The Cellnet installer who called in the leak was not present on my arrival.  
19 Instead, he had left the address with the meter obviously leaking.  
20 I turned the gas off and I informed the customer that there was a gas leak. The  
21 customer said he was unaware that the Cellnet installer had even been on the  
22 premises.

1 As I was replacing the meter, the Cellnet installer returned. He told me that he  
2 had caused the leak at this address. I asked for his name and badge number,  
3 because it is Laclede's policy to collect this information every time a contractor  
4 damages Laclede property. However, the installer refused to give me his name or  
5 badge number.

6 I called my supervisor, Mike Sisak, to inform him of the damage. He told me not  
7 to fill out a F632 damage report. It is Laclede's policy to fill out a F632 report  
8 any time there is damage to company property. Therefore, I was surprised that I  
9 was told not to fill out the report. Failing to report the damage prevented  
10 documentation of this mistake made by the Cellnet installer.

11 **Q. Do you recall the particulars of any other AMR leaks?**

12 A. On August 24, 2006, I was approached by a customer while performing a job at  
13 another residence. He said that he smelled gas inside his house. I went to his  
14 house and my Sensit leak detector went off immediately. I called Laclede to  
15 report the leak. Service employee Andre Whitley replaced the meter at this  
16 address.

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

18 A. Yes.