

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

**FILED?**  
JUL 15 2005  
Missouri Public  
Service Commission

In the Matter of the Application of Laclede )  
Gas Company for a Temporary Variance ) Case No. GE-2005-0405  
From Certain Portions of Rule 10.A of its )  
Tariff Regarding Meter Testing in )  
Connection with its Implementation of )  
An Automated Meter Reading Program )

**PACE LOCAL 5-6'S REPLY TO LACLEDE GAS COMPANY'S  
RESPONSE IN OPPOSITION TO APPLICATION TO INTERVENE**

COMES NOW Paper, Allied-Industrial, Chemical, and Energy Workers Local No. 5-6, AFL-CIO ("Local 5-6"), and for its reply to Laclede Gas Company's response in opposition to Local 5-6's application to intervene, states as follows:

1. On June 20, 2005, Local 5-6 filed a verified application to intervene in this proceeding.
2. While Local 5-6 initially takes no position regarding Laclede's Application, Local 5-6 believes that allowing discovery in this matter is in its members' and the public's best interests.
3. Laclede's Application seeks a variance from statistical sampling requirements of the meter testing program under which it currently operates, Rule 10.A. on Fifth Revised Sheet No. R-8 of the Company's tariff. Under the statistical sampling program, meter groups with accuracy rates of less than 90% require annual testing. Following annual testing, should a certain percentage of meters be found not accurate, Laclede is obligated to replace them.
4. This meter sampling program ensures accuracy of customer billing by a systematic removal of improperly functioning meters.

5. Laclede Gas has received anecdotal evidence from its meter readers that a high percentage of trace devices, which allow remote reading of meters, are found to function incorrectly when tested in the sampling program, and require replacement.

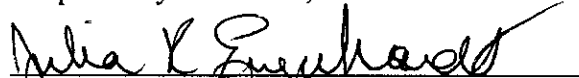
6. This leads to the conclusion that, should the variance be granted, thousands of customers will be subjected to estimated readings unnecessarily, which potentially poses a considerable detriment to consumers.

7. Additionally, despite Laclede's assertions, there is no assurance that Laclede will resume and perform the current statistical meter sampling program in 2007; certainly, however, there will be substantial impact on Local 5-6's members for at least the period of the proposed variance.

8. These concerns yield the conclusion that the Commission should allow Local 5-6 to intervene in this matter and investigate the accuracy of trace devices as well as Laclede's proposed staffing levels over the next two years.

WHEREFORE, for the foregoing reasons, Paper, Allied-Industrial, Chemical, and Energy Workers Local 5-6, AFL-CIO, respectfully requests that the Commission grant Local 5-6's application to intervene.

Respectfully submitted,



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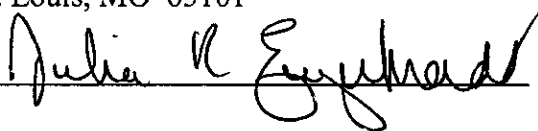
Attorneys for Paper, Allied-Industrial  
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**Certificate of Service**

The undersigned hereby certifies that a copy of the foregoing was sent by U.S. Mail, this 13<sup>th</sup> day of July, 2005, postage pre-paid to:

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