

1 ever given the detection device.

2 Q: How does a meter reader go about  
3 detecting leaks? What are you supposed to do  
4 to detect leaks?

5 A: Normally if, in different situations  
6 on a normal route where you're reading for  
7 billing, actually the billing for the customer,  
8 basically the leak's detected as we're reading  
9 the meter.

10 Q: So, if you smelled a leak, for the  
11 first 23 years of your service, if you smelled  
12 the leak, then you called the gas company and  
13 reported it, is that correct?

14 A: Correct.

15 Q: And for the last three years, you  
16 could either smell gas or alternatively maybe  
17 this leak detector would pick it up, pick up  
18 the gas?

19 A: Right.

20 Q: What is the primary function of the  
21 meter reader, is it billing?

22 A: Billing.

23 Q: Is the primary reason?

24 A: That's the primary.

25 Q: Okay. And do you know whether safety

FILED<sup>2</sup>

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Missouri Public  
Service Commission

Exhibit No. 22  
Case No(s). GC-2006-006  
Date 5-23-06 Rptr KF

1 is considered any part of the function of a  
2 meter reader?

3 A: Yes, I'm going to do -- yes, I do.  
4 Safety is a main factor, I know if we do run  
5 across a leak and we do not turn it in, we'll  
6 be disciplined for it.

7 Q: Okay. If you know of a leak and you  
8 turn it in, you will be disciplined, right?

9 A: No, I didn't say that, I'm sorry. I  
10 said if we find a leak and we do not turn it  
11 in, we'll be disciplined.

12 Q: Right, I'm sorry. And what happens if  
13 you don't find a leak and there is one, do you  
14 get disciplined for that?

15 A: No.

16 Q: Who told you that safety was a primary  
17 function of meter readers?

18 A: Our supervisors, the men who lead the  
19 classes at our different corrosive pipe  
20 inspection, the annual read classes that we  
21 took.

22 Q: Have you ever heard of a meter reader  
23 being disciplined for not finding a leak?

24 A: Not for not finding a leak, no.

25 Q: Where do you work? What district do

1           A: No, there were several leaks there all  
2 the time.

3           Q: Other than River Bluff Apartments, can  
4 you think of any others where you had leaks  
5 with inside meters?

6           A: Majority of my inside meters were the  
7 River Bluff Apartments.

8           Q: Okay.

9           A: So like I said, there was one other  
10 route I had a few insides on it, the majority  
11 of my routes were outside.

12          Q: Did any of those leaks, to your  
13 knowledge, when you observed the leak, did you  
14 have any idea how long that leak had been  
15 there?

16          A: No.

17          Q: To your knowledge, was anyone ever  
18 injured by any of those leaks?

19          A: No.

20          Q: To your knowledge, was any property  
21 damaged as a result of any of those leaks?

22          A: Not that I'm aware of.

23          Q: In your 26 years, are you aware of  
24 anyone being injured as a result of a leak that  
25 you found?

1 A: Is this a yes or no answer, or?

2 Q: Yes.

3 A: No.

4 Q: In your 26 years, are you aware of any  
5 property that was damaged as a result of a leak  
6 that you found?

7 A: I'm just confused somewhat because the  
8 questions you're asking is if I found the leak  
9 and I turned it in, of course there's going to  
10 be no loss of life or property because I had  
11 turned the leak in.

12 Q: Well, except --

13 A: So I'm confused by the question.

14 Q: Well, I understand. But isn't it  
15 entirely possible that the leak was there  
16 before you got there, right? By definition, a  
17 leak had to exist before you found it, right?

18 A: Correct, but as I said before, we read  
19 a 21 month billing day, and several times there  
20 was not a leak at the meter the month before  
21 when I had read it.

22 Q: How do you know it?

23 A: Because I did not detect a leak or my  
24 detector did not go off the month before.

25 Q: Or your, your detector being your nose

1 A: It can.

2 Q: Do customers often report to you that  
3 they smell gas?

4 A: Yes, they do.

5 Q: Are they often right?

6 A: Yes.

7 Q: Are they right most of the time?

8 A: I would not say most of the time, but  
9 I would say it's 50/50.

10 Q: They're only right 50 percent of the  
11 time?

12 A: Yes.

13 Q: How often are you right when you smell  
14 gas, do you know? Do you have any way of  
15 determining that?

16 A: The only way I have to determine that  
17 is I do go back by, when I call in a leak and  
18 I'm checking on it and if there is a serviceman  
19 outside the house, if I catch him outside the  
20 house or if he's coming out of the house, I'll  
21 ask him where the leak was.

22 Q: Would you say you're right about 50  
23 percent of the time also?

24 A: More than that.

25 Q: What would you say you're right?

1 A: About 90 percent.

2 Q: About 90 percent. In paragraph No.  
3 11, you state "about three years ago, Laclede  
4 Gas issued leak detection devices to the meter  
5 readers to assist in detecting gas leaks at  
6 inside meters", do you see that?

7 A: Correct.

8 Q: Do you know whether that's a true  
9 statement?

10 A: It is a true statement.

11 Q: Do you know that that's the reason  
12 that they issued the leak detection devices?

13 A: That's how it was explained to me.

14 Q: Do you know whether those devices are  
15 required by law?

16 A: No, I do not.

17 Q: Do you know whether those devices were  
18 issued as part of the three year corrosion  
19 inspection?

20 A: No, I do not.

21 Q: Do you know whether there is any law  
22 or regulation that requires Laclede Gas or any  
23 other gas utility to manually read meters?

24 A: No, I do not.

25 Q: In paragraph 13, you said "the meter

1 be required to do it more than that if it comes  
2 out on your sheet?

3 A: Correct.

4 Q: Okay. In paragraph 22 of your  
5 declaration, you say "based on the number of  
6 meter leaks and improperly installed AMR  
7 devices I found when I was performing monthly  
8 manual meter reads on outside meters with newly  
9 installed AMR, I believe that annual reads of  
10 inside meters with AMR would detect a  
11 significant number of similar problems".

12 MS. SCHRODER: Before he answers that,  
13 I want to point out this is the second  
14 paragraph 22, we have a typo.

15 MR. ELBERT: Correct.

16 Q: (By Mr. Elbert) Do you see that?

17 A: Correct.

18 Q: What does that mean?

19 A: From when I read meters in St. Charles  
20 during the initial phase of the AMR  
21 installation, that there was a significant  
22 amount of gas leaks.

23 Q: Mostly on outside meters obviously,  
24 right?

25 A: The installation for an inside and an

1 outside meter is no different, though.

2 Q: Well, I understand that, but only five  
3 percent of all the meters that you read in St.  
4 Charles were inside meters, correct?

5 A: Correct.

6 Q: So, are you saying here that most of  
7 these, of all these leaks that you found in St.  
8 Charles that you've testified to before in that  
9 three to four month period, the number was  
10 between 60 and 160, were those all, 95 percent  
11 outside meters?

12 A: I would say yes.

13 Q: 100 percent outside meters?

14 A: No.

15 Q: So, in other words with respect to  
16 inside meters, are you suggesting -- well,  
17 about how many -- let me ask it a given  
18 different way. About how many leaks did you  
19 find in that three to four month period on  
20 inside meters?

21 A: River Bluff Apartments were --

22 Q: That was --

23 A: -- inside meters, there was a  
24 significant amount of leaks in there, I don't  
25 have a specific number, but there were quite a



1 few leaks in there.

2 Q: And were those leaks attributable to  
3 AMR or were those the same leaks that you had  
4 been finding in the River Bluff Apartments over  
5 the years?

6 A: Both.

7 Q: How many were attributable to AMR?

8 A: I would say, I know I remember calling  
9 in at least six or seven.

10 Q: When you say in here there was a  
11 significant number of problems, what's a  
12 significant number?

13 A: For the meters that I had read, I  
14 wonder if on that, the significant number I  
15 think pertained more to the different types of  
16 problems versus the number of meters, but like  
17 they were having with the -- yes.

18 Q: Well, it says "I believe the annual  
19 reads of inside meters with AMR would detect a  
20 significant number of similar problems".

21 A: Oh, okay, last paragraph.

22 Q: What is a significant number?

23 A: If it's a leak, I would say anything.

24 Q: So one leak?

25 A: One leak would be.

1 Q: So, that's what you meant by  
2 significant number here?

3 A: One or more, yes.

4 Q: Okay. And similar problems, what does  
5 that mean?

6 A: With the same problems that we had out  
7 in St. Charles on the outside meters with  
8 meters being, meter faces being removed with no  
9 AMR device installed, we've had devices where  
10 no dials were on it after they installed the  
11 AMR, the tamper proof locks were missing.

12 Q: Do you believe that monthly readings  
13 would also detect a significant number of  
14 similar problems?

15 A: With AMR meters?

16 Q: Yes.

17 A: If we're not reading the inside meters  
18 like we are now, I don't see why that would be  
19 significant.

20 Q: Well, you say "I believe that annual  
21 reads of inside meters with AMR would detect a  
22 significant number of problems", do you see  
23 that?

24 A: Oh, annual reads, I thought you said  
25 monthly.

1 be found -- do you have -- well let me rephrase  
2 it. Do you have any facts on which you would  
3 rely -- that's a bad question, too.

4 A: Excuse me, to go back to that, on the  
5 question you had asked me before, could you  
6 repeat that.

7 (Whereupon, the requested portion of the  
8 transcript was read for the record)

9 MS. SCHRODER: Imminent safety  
10 hazards.

11 A: Yes. With the procedures for a meter  
12 reader calling a gas leak, he's probably not  
13 going to know the danger of that leak, so for  
14 me to say, the reason I said no is because they  
15 may call in a leak, but they don't know what  
16 the outcome of the leak is.

17 Q: (By Mr. Elbert) Sure. These leaks  
18 that you've been talking about that you have  
19 found, do you have any reason to believe that  
20 those leaks wouldn't be found by the customer  
21 or other Laclede Gas service people if there  
22 were not annual meter readings?

23 MS. SCHRODER: Objection to the extent  
24 that was already asked and answered, but you  
25 can answer.

1           A:   Okay.  I've had a personal experience  
2           with a woman that she thought she had sewer  
3           problems and when I went in to read her meter,  
4           it was a gas leak --

5           Q:   (By Mr. Elbert)  Well, okay.

6           A:   -- so --

7           Q:   Did that woman call Laclede Gas  
8           Company?

9           A:   No, I called in the leak.

10          Q:   But I'm saying, did she call Laclede  
11          Gas Company or did she -- did she call Laclede  
12          Gas Company to tell them that she thought she  
13          smelled gas is what I'm asking?

14          A:   No.

15          Q:   So, there's this one incident that a  
16          woman thought it was a sewer problem and it  
17          turned out to be a gas leak that you're talking  
18          about?

19          A:   Yes.

20          Q:   Okay.  And when was that?

21          A:   I would say probably 10 years ago.

22          Q:   Have you had any other incidents  
23          besides that one?

24          A:   I've had a few like that where they  
25          said they had an odor in their basement, they

1 didn't know what it was.

2 Q: Do you know where that gas leak was  
3 when that woman -- where was that gas leak?

4 A: It's been so long, I don't remember.

5 Q: Was it at the meter?

6 A: It was a meter or the fuel run, either  
7 coming out of the wall, either it was the lock  
8 cock or --

9 Q: So it was around the meter --

10 A: Yes.

11 Q: -- somewhere?

12 A: Yes.

13 Q: Have you ever had any where, and I  
14 think you did answer this, you've come in and  
15 there have been appliances leaking?

16 A: Correct.

17 Q: Okay.

18 MR. ELBERT: I don't think I have any  
19 other questions -- oh, maybe I do.

20 (Off the record)

21 Q: (By Mr. Elbert) Let me make sure I  
22 understand one thing. On these three year  
23 corrosion inspections, those are assigned on  
24 your regular route, correct?

25 A: Yes.