

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

JAN 05 2007

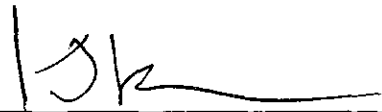
Missouri Public  
Service Commission

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

AFFIDAVIT OF J. TOBIAS KEPNER

STATE OF MISSOURI )  
 ) ss  
COUNTY OF ST. LOUIS )

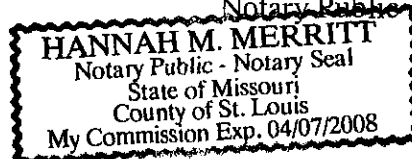
J. Tobias Kepner, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 3 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by 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.

  
\_\_\_\_\_  
J. Tobias Kepner

Subscribed and sworn to before me this 22 day of September, 2006.



Notary Public



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

USW Exhibit No. 23-NP  
Case No(s) GC-2006-0390  
Date 12/12/06 Rptr MN

**DIRECT TESTIMONY**  
**OF**  
**J. TOBIAS KEPNER**  
**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 J. Tobias Kepner and my address is **\*\*** **\*\***, St. Louis, MO  
3       63118.

4   **Q.   How did you first find out about the installation of AMR devices on gas**  
5       **meters by Cellnet subcontractors?**

6   A.   I read in the Labor Tribune that Cellnet subcontractors were installing the AMRs.

7   **Q.   When did Laclede notify you that an AMR device was to be installed in your**  
8       **home?**

9   A.   In May of 2006, I received a door hanger bearing the Laclede logo. It stated that I  
10       should call the listed number in order to schedule a time for the installation of an  
11       AMR device. I called the number and requested to have a Laclede gasworker  
12       perform the AMR installation. Despite the fact that the postcard bore the Laclede  
13       logo, the listed number was not Laclede's. When I called, the person on the  
14       phone said that they were not Laclede Gas, and she gave me Laclede's number. I  
15       called Laclede and requested to have a gasworker install the AMR device. I  
16       scheduled a time to have the AMR device installed by a union gasworker.

1   **Q.   Why did you ask to have a Laclede gasworker, as opposed to a Cellnet**  
2       **subcontractor, install the AMR device?**

3   **A.**   I understand and believe that union gasworkers have substantial training not  
4       available to the Honeywell subcontractors that enable them to recognize and fix  
5       potential problems when installing the AMR device. Accordingly, I believe it is  
6       safer to have an AMR device installed on my gas meter by a union gasworker  
7       rather than by a Honeywell subcontractor.

8   **Q.   Was the AMR device then installed as scheduled?**

9   **A.**   No. I received a cancellation message from Laclede the same day that I had  
10       scheduled the installation. The message left a number to call if I had any  
11       questions. I promptly called it. The service representative said that Laclede  
12       gasworkers were not performing the AMR installation because they did not know  
13       how and they did not have the experience to install the AMR device. I told the  
14       representative that I did not want a subcontractor with questionable gas  
15       experience to install the AMR device in my home. The representative said that  
16       my name would be put on a list of people who had requested that a gasworker  
17       install the AMR device. However, the representative said that there is no current  
18       policy to have the gasworkers perform the installation. I then asked if there was  
19       any plan to allow for gasworkers to perform the installation in the future, and the  
20       representative said there was no such plan.

21   **Q.   Has either Laclede or Cellnet made any further attempts to contact you**  
22       **about the AMR installation?**

1 A. I have not received any additional phone calls. However, I have received one  
2 doorhanger and one postcard asking to install an AMR device on my meter.

3 Q. Are you an employee or member of USW Local 11-6, or to your knowledge  
4 are you related by blood or marriage to any USW Local 11-6 officer or  
5 business representative?

6 A. No.

7 Q. Does this conclude your direct testimony?

8 A. Yes.