

Exhibit No.:	
Issue:	AMR Installation
Witness:	Clark Korbisch
Type of Exhibit:	Rebuttal Testimony
Sponsoring Party:	Laclede Gas Company
Case No:	GC-2006-0390
Date:	November 8, 2006

LACLEDE GAS COMPANY

GC-2006-0390

REBUTTAL TESTIMONY

OF

CLARK KORBISCH

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1
2 Q. What is your name and address?

3 A. My name is Clark Korbisch, and my business address is 30000 Mill Creek
4 Avenue, Suite 100, Alpharetta, Georgia 30022.

5 Q. By whom are you employed and in what capacity?

6 A. I am employed by CellNet Technology, Inc. ("CellNet") as Vice-President of
7 Customer Operations.

8 Q. How long have you been at CellNet?

9 A. I joined CellNet in 1997, and worked in sales support in Chicago.
10 I moved to Indianapolis in 1999, and was the operations manager responsible for
11 building up the network and deploying the AMR meters in Indianapolis. I moved
12 to St. Louis in December of 2001, and had the responsibility as operations
13 manager for the St. Louis office. I was promoted to my present position in 2006,
14 and I now have responsibility for all of our field operations.

15 Q. What did you do before you were hired by Cellnet?

16 A. I worked as a project engineer for Commonwealth Edison, an electric utility, in
17 Chicago.

18 Q. Could you briefly summarize for me your education?

19 A. I have an electrical engineering degree from Marquette University in Milwaukee.

20 Q. What is CellNet doing for Laclede?

21 A. In March 2005, Laclede and CellNet signed a 15-year contract under which CellNet
22 is deploying a radio frequency fixed network to provide meter readings to Laclede
23 throughout its service territory.

1 Q. Has CellNet used this technology for other gas utilities?

2 A. Yes, CellNet has network operations in Seattle, Kansas City, Milwaukee,
3 Philadelphia and Minneapolis-St. Paul that provide meter readings to various gas
4 companies.

5 Q. Where is the network operations center for Laclede?

6 A. In Kansas City.

7 Q. Is Laclede the only utility served out of this center?

8 A. No, among gas companies, Cellnet provides AMR service to Ameren and Kansas
9 Gas Service from the Kansas City operations center. CellNet also provides AMR
10 services to KCP&L out of that center.

11 Q. How long has CellNet been providing AMR service?

12 A. For more than 10 years.

13 Q. How many AMR devices has CellNet installed in that time?

14 A. About 13 million.

15 Q. How many AMR devices have you installed in the country on gas meters?

16 A. Roughly 3.5 million.

17 Q. And are you aware of any gas leaks caused by an AMR installation?

18 A. No. ** _____
19 _____
20 _____
21 _____
22 _____
23 _____

1 _____
2 _____
3 _____
4 _____.**

5 Q. How many AMRs have been installed to date in the Laclede project?

6 A. About 600,000.

7 Q. Are you aware of any incidences in those 600,000 installations, such as explosions
8 or fires, that have resulted in personal injury or property damage?

9 A. None.

10 Q. Of the 3.5 million gas modules installed by CellNet, are you aware of any
11 incidences, such as explosions or fires, that have resulted in personal injury or
12 property damage?

13 A. None. In the entire history of CellNet, there have been no explosions.

14 Q. Do you know why there have been no gas incidences on AMR installations?

15 A. Yes. The devices are designed to operate without interfering with the flow of gas
16 through the meter. The AMR installation does not breach the integrity of the meter
17 itself. The AMR module attaches to a frame on the outside of the meter. Because it
18 does not interfere with the areas of the meter where gas flows, AMR installation
19 does not cause leaks or lead to a danger of fire or explosion.

20 Q. Does CellNet subcontract out the actual installation of the AMR modules?

21 A. Yes. Installation for the Laclede project is handled by the Honeywell Corporation.

22 Q. Does CellNet have any prior experience with Honeywell handling AMR
23 installations?

1 A. Yes. Honeywell has installed CellNet natural gas modules for gas service in
2 Minneapolis.

3 Q. Is there any safety training provided to the AMR installers supervised by
4 Honeywell?

5 A. Yes. Prior to launching this project, Laclede and CellNet jointly developed training
6 materials, including safety training. The training materials used for the installers is
7 attached to the Deposition of Deb Redepenning, as Exhibits 1-8, and incorporated
8 herein.

9 Q. Who is Deb Redepenning?

10 A. She is a Senior Program Manager with Honeywell Utility Solutions, and she is
11 responsible for the Laclede project.

12 Q. Do the training materials include training for gas safety?

13 A. Yes, that training manual is Exhibit 5 attached to Ms. Redepenning's deposition.

14 Q. What is an AMR installer instructed to do if he or she detects a gas leak?

15 A. The installer is to contact a supervisor, who will then contact Laclede to address the
16 situation.

17 Q. Are AMR installers trained to inspect Laclede's piping and meter equipment for
18 corrosion?

19 A. No, that is not part of their duties.

20 Q. Does CellNet have a quality control program on installations?

21 A. Yes. We perform quality audits on a random basis, checking a certain percentage of
22 installs per installer daily. If we find a problem with an installer's work, we will
23 address it. For example, if an installer has misprogrammed a meter, we send them

1 back to remedial meter reading training. If it is an installation problem where they
2 have left debris, we instruct the installer regarding debris left behind. If we find a
3 situation that was a safety violation, where the individual wasn't wearing proper
4 protective equipment, that would be grounds for disciplinary action, up to and
5 including termination. So the audits follow up on the safety and quality of the
6 installation. And we do some physical audits of the individual installations, not
7 necessarily just after the installer has left the work site. We actually witness the
8 installers doing the work in the field.

9 Q. What does CellNet do if, after an AMR installation, it appears that the module is not
10 operating properly?

11 A. CellNet will investigate the issue, including a field investigation, where we will
12 return to the home to see if the index and the module are in sync.

13 Q. How often have you had to replace a module that wasn't working properly?

14 A. We have replaced less than 2% of the modules installed thus far in the Laclede
15 project, some of which we replaced as a matter of convenience rather than taking up
16 Laclede's customer's time troubleshooting the installation.

17 Q. Does this conclude your rebuttal testimony?

18 A. Yes, it does.