

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

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

MOTION IN SUPPORT OF DEPOSITION SUBPOENAS

Comes now USW 11-6 and requests the Commission to issue deposition subpoenas in this matter to third parties Frank Meuting and Honeywell Corporation for the reasons set forth below:

1. The complaint in this matter pertains to the issue of the safe and adequate installation of Automatic Meter Reading (“AMR”) devices on gas meters serviced by Laclede Gas Company (“Laclede”).

2. Laclede subcontracted the installation to Cellnet Technology, Inc. which, in turn, subcontracted the work to Honeywell Corporation (“Honeywell”).

3. Frank Meuting is a former employee of Manpower, Inc. (“Manpower”) who was temporarily employed or assigned by Manpower to Honeywell, where he installed AMR devices on Laclede gas meters. His testimony and documents will provide first-hand information on the experience and skill-level of AMR installers, the training provided to AMR installers, the method of installation, problems encountered by installers, time constraints or incentives placed on installer and other matters pertaining to the issue of whether AMR installation is being conducted in a safe and adequate manner.

4. The deposition of a representative of Honeywell and production of the requested documents will be instrumental in establishing Laclede’s participation in or

knowledge of the training, skills, time constraints and incentives or other terms and conditions of employment of AMR installers that may effect the quality and safety of their work, as well as establishing the consistency of Mr. Meuting's experience across AMR installers, establishing whether Honeywell is the sole source of AMR installers and establishing the extent to which Honeywell is obtaining its installers through Manpower, among other things.

5. Frank Meuting refuses to testify or provide documents in this matter without being subpoenaed. Without subpoena, USW 11-6 cannot even determine who within Honeywell it needs to seek testimony from. Moreover, USW 11-6 cannot obtain the requested documents, all of which support the development of the fact issues identified in paragraph 4 herein, without subpoena.

6. PSC regulations provide that parties to a complaint have available the full panoply of discovery available to litigants in the Missouri judicial system. USW 11-6 would be permitted the opportunity to conduct the referenced third-party discovery in similar litigation in the Missouri courts.

Wherefore, USW 11-6 respectfully requests the PSC issue the referenced third-party subpoenas which have been separately filed.

Respectfully submitted,

/s/ Sherrie A. Schroder

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on June 30, 2006, by United States mail, hand-deliver, email, or facsimile upon:

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