

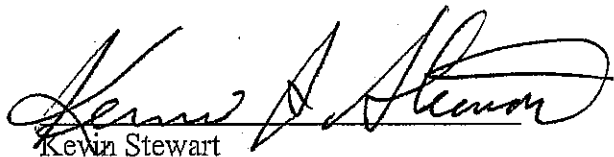
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

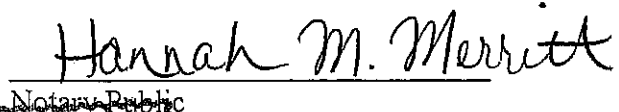
AFFIDAVIT OF KEVIN STEWART

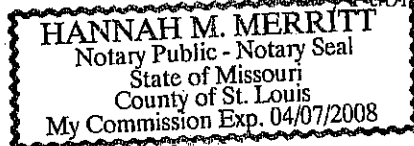
STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

Kevin Stewart, 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.


Kevin Stewart

Subscribed and sworn to before me this 21 day of September, 2006.


Notary Public



My commission expires _____

DIRECT TESTIMONY
OF
KEVIN STEWART
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 Kevin Stewart and my address is ~~St.~~ ~~St.~~ St.
3 Charles, Missouri, 63304.

4 Q. What is your current place of employment and how long have you worked
5 there?

6 A. I am currently employed by Laclede Gas Company as a meter reader. I have
7 worked there for twenty-six years.

8 Q. Have you held any officer or executive board positions in USW 11-6?

9 A. No.

10 Q. What training have you received from Laclede?

11 A. I have received training on meter reading, checking for corrosion in gas lines, and
12 gas leak detection, including use of portable gas detection devices. Specific to
13 leak reporting, I have also been trained on Company procedures for reporting
14 leaks, and proper procedures for informing customers of leaks. Furthermore, I
15 receive ongoing instruction one or two times per year.

1 Q. Based upon your training, what is your opinion of the dangerousness of gas
2 leaks?

3 A. As a trained gasworker, it is my opinion that any leak, even if minor, is
4 dangerous.

5 Q. In your employment as a meter reader, have you been assigned to read
6 meters with an AMR device installed?

7 A. Yes. As part of my normal meter reading routes, I have been assigned to read
8 many meters that have AMR devices.

9 Q. Approximately how many meters have you typically been assigned to read?

10 A. When I was assigned to the St. Charles area, where most meters are located
11 outside customers' homes, I would read several hundred meters a day, totaling
12 anywhere from 8,000 to 10,000 meters each billing cycle.

13 Q. How many of those meters had AMR devices installed?

14 A. AMR devices began being installed in early 2005. By the time I ceased reading a
15 St. Charles route in late 2005, most of those meters had AMR devices installed.

16 Q. In the course of your duties, did you observe AMR devices that were
17 improperly installed?

18 A. Yes. When assigned to AMR routes, I observed numerous AMR devices that
19 were improperly installed in some fashion in the St. Charles area, over the course
20 of about eight months.

21 Q. Did you walk an AMR route every day?

22 A. No. During the initial phase of AMR installation, I might have only one or two
23 routes a week with AMR devices.

1 Q. In what way did the AMR installations appear to have been improperly
2 done?

3 A. The glass over the dials was broken or unsealed; half-installed AMRs; AMRs
4 with broken screws; AMRs that had been installed in such a way that they caused
5 a gas leak; and AMRs that would not read at all because of poor installation.

6 Q. How frequently would you find AMR devices that were leaking gas while
7 reading meters?

8 A. I would typically find one or two leaks per day from AMR devices when I was
9 assigned to an AMR route.

10 Q. Did you report those leaks?

11 A. Yes. I called those leaks in, according to my training and Laclede Gas procedures.

12 Q. To whom did you report the leaks?

13 A. I called the Laclede gas leak line with my Company-supplied cell phone. The
14 number of the leak reporting line is 314-342-0800.

15 Q. Do you know what happened after you reported a leak?

16 A. The dispatcher was supposed to send a serviceman to investigate the leak. I
17 would sometimes see the serviceman, or his vehicle, as I continued on my meter
18 reading routes.

19 Q. Did you fill out any report about the leaks?

20 A. Meter readers are not required to keep track of or document how many leaks we
21 call in. We are only required to call the leak line when we detect a leak.

22 Q. Based on your training, was any Laclede Gas employee required to document
23 your leak calls and the reason for the leaks?

1 | A. Dispatchers should have made records of service calls. Servicemen should have
2 | reported on the results of those calls.

3 | **Q. Does this conclude your direct testimony?**

4 | A. Yes.