

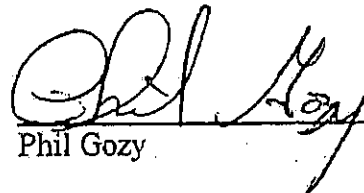
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

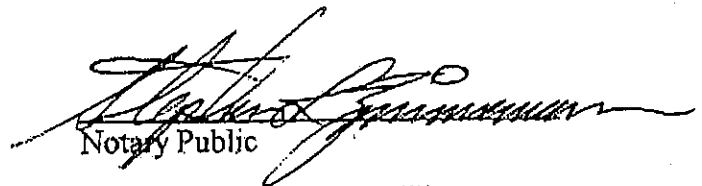
AFFIDAVIT OF PHIL GOZY

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

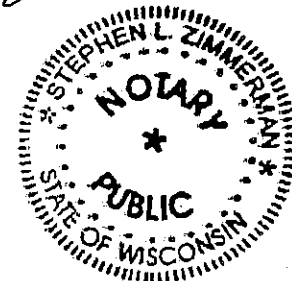
Phil Gozy, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 2 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him; that 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.


Phil Gozy

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


Notary Public

My commission expires 12-30-07



DIRECT TESTIMONY
OF
PHIL GOZY
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 Phil Gozy and my address is **

3 **

4 Q. Do you have any union affiliation?

5 A. I am the vice president of United Steelworkers Local 2006.

6 Q. Have AMR devices been installed in Wisconsin?

7 A. Yes. Numerous Wisconsin utilities have switched to an AMR system.

8 Q. Has the Wisconsin Public Service Commission taken any steps to ensure the
9 safety of the installation of AMR devices?

10 A. The Wisconsin Public Service Commission has required stipulations by the
11 utility companies before allowing them to install an AMR device.

12 Q. What are some of those stipulations?

13 A. For instance, the Wisconsin Electric Power Company (now known as WE
14 Energies) a company whose employees my union represents, had agreed to
15 conduct a visual survey (also known as hazard surveys) for all the meters to
16 be converted to AMR. A true and accurate copy of the Wisconsin Public

NP

1 Service Commission order dated September 20, 2002 is attached and
2 incorporated here as Exhibit 1. The hazard survey was ordered once per
3 year over a three year period beginning in 2002 (or one year after Phase I of
4 the AMR installation was complete, whichever period was greater). The
5 hazard survey includes checks for meter tampering, atmospheric corrosion,
6 gas leaks, and signs of accidental or intentional meter switching. Hazard
7 surveys also verify meter readings and addresses. WE Energies is required
8 to submit an annual report of the findings. Furthermore, WE Energies has
9 agreed to perform a leak survey of the service line and meter assembly (also
10 known as a gas service survey) every three years where the AMR system is
11 used, despite the fact that the code only requires them to perform this survey
12 on a five year basis.

13 **Q. Who performs the hazard surveys mentioned above?**

14 A. Union meter readers perform the hazard surveys.

15 **Q. What is the union's current position on the hazard surveys?**

16 A. In order to ensure the safety of the AMR meters, we are trying to codify the
17 annual hazard survey, thus making it a permanent procedure.

18 **Q. What entity is performing the AMR installation?**

19 A. WE Energies has subcontracted with Cellnet to perform the installation of
20 AMR devices.

21 **Q. Does this conclude your direct testimony?**

22 A. Yes.



LOCAL UNION 2150, IBEW
 INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS
 N8 W22520 Johnson Drive, Unit H Waukesha, Wisconsin 53186
 262-547-1033 FAX 262-547-2816 800-551-1151

December 27, 2001

DANIEL E. SHERMAN
Business Manager

Mr. David Whitcomb
 Administrative Law Judge
 PO Box 7854
 Madison, WI 53707-7854

RE: Docket 6630-CG-117

Dear Judge Whitcomb:

Local Union 2150, IBEW (International Brotherhood of Electrical Workers) represents over 3,000 employees at Wisconsin Electric/Wisconsin Gas. In addition, we also represent employees at IMServ-Field Tech; a meter reading firm contracted by Wisconsin Electric/Wisconsin Gas. As the largest Local Union in the WE/WG service territory we represent workers who provide various services to electric and gas customers across the state of Wisconsin. Among those services is meter reading. Meter readers are the primary source for the regular inspection and reporting of natural gas safety code violations of the metering equipment. Their inspections are the first line of defense in protecting the public from hazardous conditions on their property.

Our members will be affected by the Wisconsin Electric/Wisconsin Gas implementation of automated meter reading for their customers. The new meter reading system may prove beneficial to customers regarding the billing process. With that said, we recognize that this new AMR system will likely result in a reduced need for *meter reading as a specific task*. But we believe the safety and integrity of gas metering equipment connected to residential, commercial, industrial, and institutional facilities necessitates a hearing on this proposal. IBEW, Local Union 2150's full participation as representatives of the utility employees who are assigned the day to day responsibility of keeping the systems safe and reliable will bring added expertise to those hearings.

There are several issues that should be reviewed under this docket with our full party participation. They include:

1. Compliance with federal D.O.T. (Dept. of Transportation) requirements regarding gas safety of piping, meter sets, etc.
2. Compliance with PSCW requirements regarding gas safety issues (corrosion, leak surveys, public building inspections, appliance safety, etc.)
3. The over all focus on the plans impact on worker/customer safety. Converting to an AMR system will raise questions about working in hazardous conditions where the gas metering equipment may be subject to less frequent inspection by qualified employees.

There may be additional concerns raised by other interested parties on this docket. This is a dramatic change for the largest utility serving Wisconsin. AMR will not just have an impact on the utility's billing process, but will also affect employees' ability to provide utility services to ratepayers in a safe and reliable manner. Therefore, Local Union 2150, IBEW requests that a hearing be held regarding PSCW Docket 6630-CG-117 and ask to be included as a full party in any of those hearings.

Sincerely,

Forrest Ceel
 President/Business Representative
 Local Union 2150, IBEW

CC: Thomas A. Reisdorf

AMR Docket 6630-CG-117
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