

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

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

**USW 11-6'S REPLY IN SUPPORT OF MOTION TO SUBSTITE DEPOSITION
FOR LIVE TESTIMONY**

COMES NOW USW Local 11-6 ("Local 11-6"), by counsel, and replies to the responses of Staff and Laclede to its Motion to Substitute Deposition for Live Testimony. In further support of its Motion, Local 11-6 states as follows:

1. Contrary to Laclede's position, Claire Donnelly's testimony is not duplicated by any other witness, nor is it trivial. Ms. Donnelly testified that the AMR installation by a Cellnet subcontractor caused a previously-contained leak to become uncontained; that the installer ignored the leak even when she questioned him about it; that a Laclede employee subsequently had to replace her meter; and that a Laclede supervisor attempted to cover-up the incompetency of the Cellnet installer in dealing with gas leaks. Ms. Donnelly is a Laclede customer with no link whatsoever to Local 11-6. Laclede's cavalier attitude toward her is disrespectful and seems characteristic of its general attitude toward its customers, as reflected in this and other matters before the PSC this year.

2. It is further noteworthy that Laclede has yet to provide Local 11-6 or the Commission with any information of its own about Ms. Donnelly's address, despite its allegedly complete production of information pertaining to AMR installation at each of the addresses

produced by Local 11-6 in this matter, as requested in a follow-up to Local 11-6's broader initial information request.

3. Local 11-6 does not intend to address the manifold other inaccuracies in Laclede's response because they are irrelevant to this issue.

4. As Staff noted in its response, the deposition requested would be a deposition to preserve testimony, arranged for by Local 11-6. Depending on when the deposition is taken, the transcript would be ready to present to the Commission either at the time of the hearing or by the date that the hearing transcript was filed.

WHEREFORE, Local 11-6 respectfully renews its request that the Commission grant its Motion for Leave to Substitute Deposition for Live Testimony.

Respectfully submitted,

/s/ Sherrie A. Schroder
SHERRIE A. SCHRODER, MBN 40949
JANINE M. MARTIN, MBN 46465
HAMMOND, SHINNERS, TURCOTTE
LARREW AND YOUNG, P.C.
7730 Carondelet Avenue, Suite 200
St. Louis, Missouri 63105
(314) 727-1015 (Telephone)
(314) 727-6804 (Fax)
saschroder@hstly.com (E-mail)
jmartin@hstly.com (E-mail)

Attorneys for USW Local 11-6

Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on November 13, 2006, by United States mail, hand-deliver, email, or facsimile upon:

General Counsel Office
Missouri Public Service Commission
GenCounsel@psc.mo.gov

Lewis Mills
Office of Public Counsel
opcservice@ded.mo.gov

Marc Poston
Office of Public Counsel
marc.poston@ded.mo.gov

Robert Franson
Missouri Public Service Commission
robert.franson@psc.mo.gov

Michael C. Pendergast
Vice President – Associate General
Counsel of Laclede Gas Company
mpendergast@lacledegas.com

Rick Zucker
Laclede Gas Company
rzucker@lacledegas.com

/s/ Sherrie A. Schroder
