

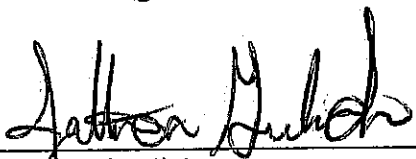
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

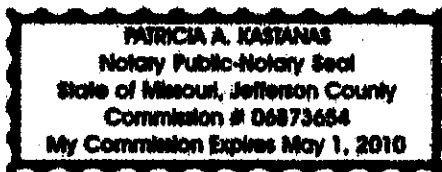
AFFIDAVIT OF JONATHAN GUELICH

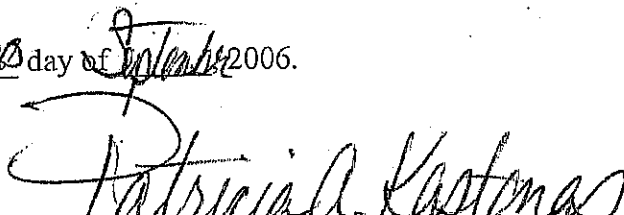
STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

Jonathan Guelich, 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.


Jonathan Guelich

Subscribed and sworn to before me this 23rd day of September 2006.




Notary Public

My commission expires May 1, 2010

DIRECT TESTIMONY

OF

JONATHAN GUELICH

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 Jonathan Guelich and my address is **, **, St.
3 Louis, MO 63109.

4 Q. For how long and in what capacity were you employed with Laclede Gas?

5 A. From September 2, 2005 to August 4, 2006 I worked at Laclede Gas as a meter
6 reader.

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

8 A. No.

9 Q. What experience do you have with AMR meters?

10 A. I was assigned to read meters that had an AMR device installed. While I do not
11 remember the specifics, I found an average of at least one or two leaking AMR
12 meters per week while I was working as a meter reader. Frequently, Cellnet had
13 recently installed the AMR device when I discovered the leak.

14 Q. How would you usually detect leaks on a leaking AMR meter?

15 A. I would find small leaks with my leak detector, but I was able to smell the larger
16 leaks without using the detection device.

1 **Q. In your experience, what are some common reasons why the AMR meters**
2 **would leak?**

3 A. I would frequently find leaks resulting from the installation of the AMR device.
4 While I am not trained in the service area, it appears to me that sometimes leaks
5 would occur when the AMR device would be screwed on too tightly, pinching the
6 gasket that prevents gas from escaping. In others, the AMR device was not
7 screwed on tightly enough and the gasket would not effectively seal the meter. In
8 both of these situations, the gasket would not contain any leaks within the meter
9 itself and therefore gas could leak.

10 **Q. After finding a leak on an AMR meter, what would you do with that**
11 **information?**

12 A. There is a phone number to call when meter readers find a leak. I would call this
13 number and a Construction and Maintenance Department employee or service
14 employee would be sent out to assess the problem.

15 **Q. Did you ever experience any other problems with AMR meters?**

16 A. Yes. I have noticed AMR meters where the first dial would click but not spin. I
17 have also seen AMR meters where the first dial would jump and not spin
18 consistently.

19 **Q. What is the impact of a non-spinning or inconsistently spinning dial?**

20 A. In my opinion, if the dial does not spin, the customer may be receiving free gas.
21 If the dial spins inconsistently, the customer may be getting overbilled. However,
22 both of these results assume that the malfunction was not merely isolated in the
23 first dial and the second dial had accurately recorded the gas usage.

1 Q. After finding a nonfunctional AMR meter, what would you do with that
2 information?

3 A. I would tell the customer to report it to Laclede. However, I would not fill out
4 any documentation in the case of a nonfunctional AMR.

5 Q. Why did you not fill out any documentation in the case of a nonfunctional
6 AMR?

7 A. There was no policy to report nonfunctional AMR devices. Laclede's policy is to
8 call in leaks or corrosion if found on meters. There is no similar policy for
9 nonfunctional meters. I was not instructed to make written records of either
10 leaking or nonfunctional AMR meters.

11 Q. Does this conclude your direct testimony?

12 A. Yes.