

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 )

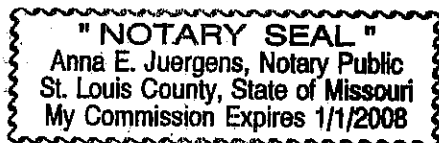
AFFIDAVIT OF STEVE WHITE

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

Steve White, 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 4 pages of Direct Testimony and attached exhibits 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.

Steve White  
Steve White

Subscribed and sworn to before me this 13th day of September 2006.



Anna E. Juergens  
Notary Public

My commission expires 01/01/08

**DIRECT TESTIMONY**

**OF**

**STEVE WHITE**

**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 Steve White and my address is \*\*

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

5 A. I work at Laclede Gas as a meter reader. I have worked there for 28 years.

6 Q. Do you hold any office or executive board positions in USW 11-6?

7 A. Not at this time. However, I was previously a shop steward and I was on the  
8 executive board for four years.

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

10 A. I have been assigned to manually read those AMR meters which management  
11 suspects are not functioning correctly. Generally, the job slips given out for these  
12 assignments read "AMR." I then go to the address and manually read the  
13 numbers on the meter. I write the meter reading down and then return it to  
14 Laclede. The manually read numbers are then compared to the readings received  
15 by the AMR device.

1 Q. Did you have an AMR device installed on your home meter?

2 A. I had an AMR device installed by Cellnet subcontractors on July 13th or 14th of  
3 2006. When the subcontractor installed the AMR device, he manually read the  
4 meter. As I was standing beside him, I also noticed the reading, which was  
5 x1188.

6 I received a bill for July two or three weeks later. A true and accurate copy of this  
7 bill is attached and incorporated here as Exhibit 1. The bill read that the reading  
8 was x1193. I decided to confirm the readings on my actual meter. However, the  
9 meter itself still read x1188, the same number from the day the AMR device was  
10 installed.

11 Q. What did you do with this information?

12 I told my supervisor, Mitch Hellickson, that the actual reading on my meter did  
13 not conform with the July bill. Mitch is in charge of the AMR program in our  
14 department. Mitch checked my meter on the computer system and said that the  
15 AMR device on my meter was registering correctly. He said that there is a  
16 computer chip inside the AMR device and that even though my meter is stuck, the  
17 device is making an actual, not estimated reading.

18 After Mitch told me that the AMR device was working properly, I decided to wait  
19 another month to see what the next bill would be. But when I received the August  
20 bill, it read x1200, which claimed to be an actual reading. A true and accurate  
21 copy of this bill is attached and incorporated here as Exhibit 2.

22 However, my meter still read x1188. Furthermore, on August 15, 2006, and  
23 August 28, 2006, the Labor Tribune took photographs of my meter. True and

1 accurate copies of these photographs and of the certification of photographing  
2 same are attached and incorporated here as Exhibits 3, 4, and 5 respectively. In  
3 both photographs, the meter still read x1188.

4 On August 29, 2006, I talked to Mitch again and told him about the situation with  
5 my meter. Mitch told me that he would have a Cellnet subcontractor fix the stuck  
6 meter.

7 Around 4:30 p.m. on August 29, 2006, a Cellnet subcontractor arrived at my  
8 home. He initially said that it was unfortunate that it was not wintertime, or I  
9 could have received a great deal of free gas. I found this to be suspect, as it  
10 contradicted what Mitch had said about the chip inside the AMR device.

11 The subcontractor said he had to call Mitch to ask how he wanted him to program  
12 the meter. When he returned, he set the meter at x0000.

13 **Q. Based on your experience with AMR devices as both a meter reader and a**  
14 **customer, do you have any general concerns about the accuracy of AMR**  
15 **devices as currently installed?**

16 **A. Yes.**

17 **Q. What are those concerns?**


18 **A. From my experience as a meter reader in consistently being asked to read AMR**  
19 **meters, it is my opinion that Laclede is concerned about the accuracy of many**  
20 **AMR devices, including those on commercial and industrial meters.**

21 Normally, it is possible to confirm a suspect AMR reading by comparing the  
22 reading registered by the AMR device to a manual reading. But if the meter itself  
23 is stuck, the data on the meter face is not consistent with the information that

1 Cellnet is apparently receiving from the computer chip inside the AMR.  
2 Therefore, the customer has no way of verifying his or her actual usage against  
3 the reading made by the alleged AMR computer chip. In effect, customers are  
4 forced to rely on Laclede or Cellnet's word in determining their bill.


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

6 **A. Yes.**

<b>Laclede Gas Company</b> SERVICE AT: <b>**7450 LAUREL AVE**</b> ACCT NO. <b>424558-01</b> DEPOSIT <b>0.00</b> RATE <b>RG</b> AVERAGE GAS COST PER THERM <b>11.02941</b> DEGREE DAYS <b>0</b>					DRAWER 2 ST. LOUIS, MO 63177  FIRST-CLASS MAIL U.S. POSTAGE PAID POST CARD RATE PERMIT NO. 330 XXXXXXXXXXXXXXXX	
PRESENT READING	PREVIOUS READING	DIFFERENCE	BTU FACTOR	THERMS	BILL DETAIL	
1193	1183	10	1.021	10.2	PRIOR GAS BALANCE	35.48
					PRIOR OTHER BALANCE	10.31
					PAYMENT THANK YOU	45.79
					WATER HEATER	10.31
					CHARGE FOR GAS SVC 06-23-06 TO 07-25-06	24.70
ESTD BASED ON SPECIAL READ					INCLUDES A MONTHLY ISRS CHARGE OF 0.22	
					RICHMOND HTS TAX	1.58
OTHER CHARGES					ACCOUNT BALANCE	36.59
CURRENT CHARGES						
					START BUDGET BILLING NEXT MONTH	
					CHECK THE BLUE BOX BELOW	
					YOUR BUDGET AMOUNT WILL BE	102.00
					SEE ENCLOSED NOTICE	
AMOUNT DUE <b>\$36.59</b>						
PAYMENT DUE BY <b>08-08-06</b> DELINQUENT AFTER <b>08-17-06</b>						

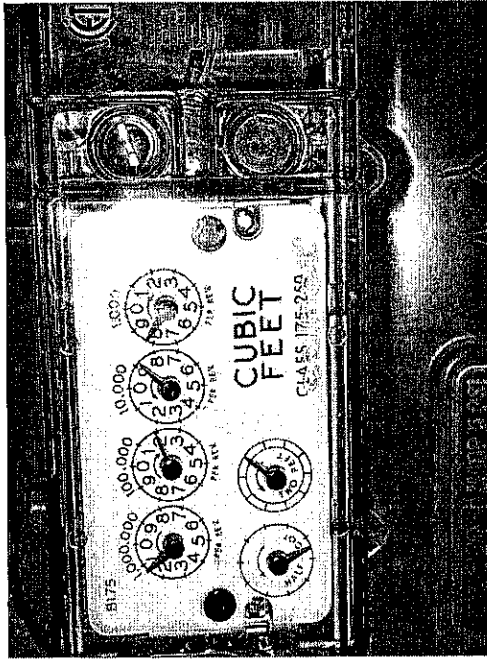
July  
 bill  
 photocopied  
 8/15/06



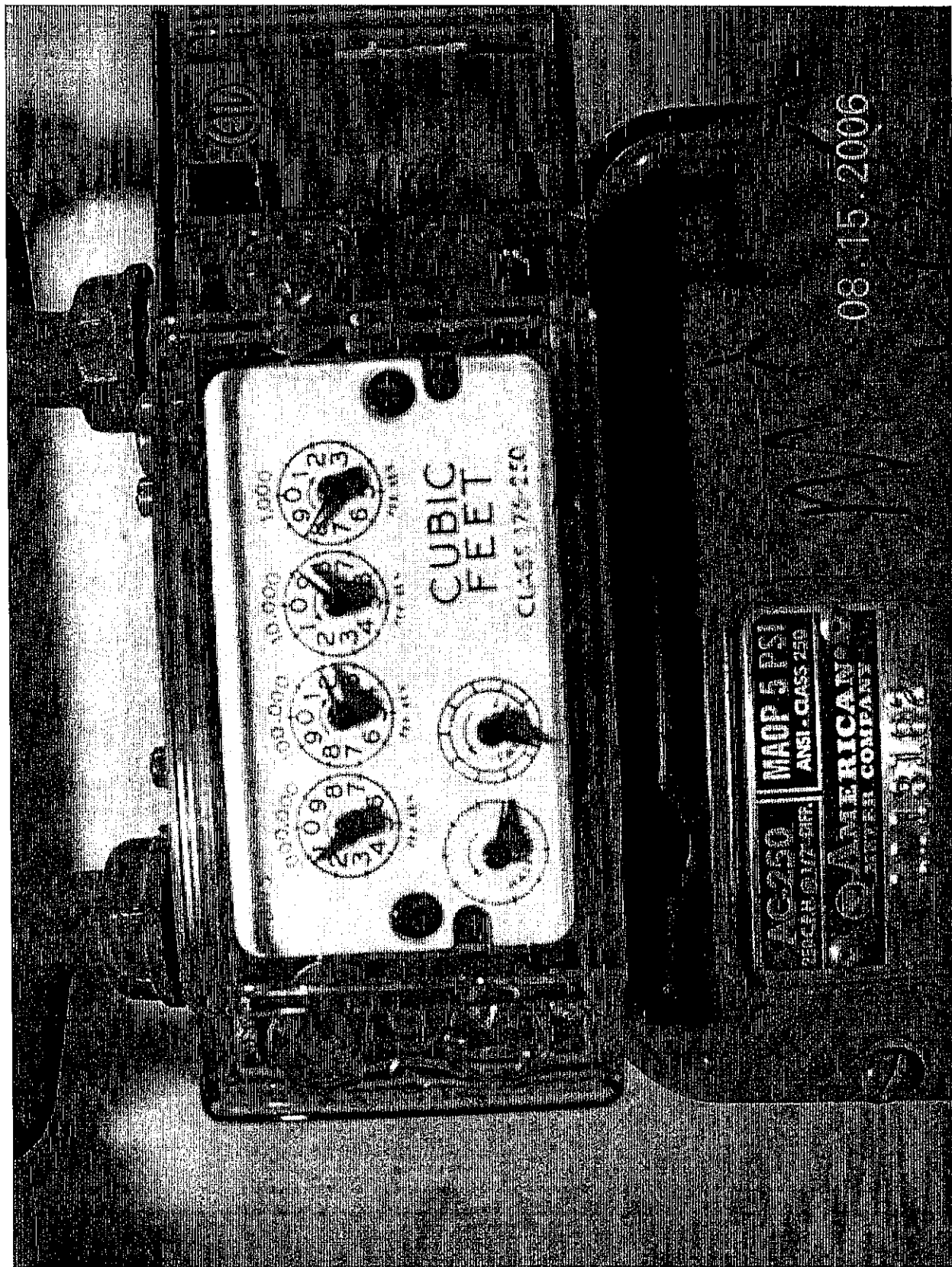
<b>Laclede Gas Company</b>					DRAWER 3 ST. LOUIS, MO 63171				FIRST-CLASS MAIL U.S. POSTAGE PAID POST CARD RATE PERMIT NO. 786	
SERVICE AT: <b>**7400 E. BENT AVE **</b>					DEPOSIT <b>0.00</b> RATE <b>RG</b>		PRESORTED			
ACCT NO. <b>424558</b>					AVERAGE GAS COST PER THERM <b>1.02917</b> DEGREE DAYS <b>0</b>					
PRESENT READING	PREVIOUS READING	CHANGE (GO)	BTU FACTOR	THERMS	BILL DETAIL			AMOUNT		
1200	1195	5	1.025	7.2	PRIOR GAS BALANCE			26.28		
					PRIOR OTHER BALANCE			10.31		
					PAYMENT THANK YOU			36.59		
					WATER HEATER			10.31		
					CHARGE FOR GAS SVC 07-25-06 TO 08-22-06			21.03		
ACTUAL READING					AMOUNT					
OTHER CHARGES					10.31					
CURRENT CHARGES					22.37					
					RICHMOND HTS TAX			1.34		
					ACCOUNT BALANCE			32.68		
					(INCLUDES A MONTHLY ISRS CHARGE OF 0.22) HELP SOMEONE IN NEED, GIVE TO DOLLAR HELP, CHECK A RED BOX TO ADD A DONATION TO EACH MONTH'S GAS BILL.					
					<b>AMOUNT DUE \$32.68</b>					
					PAYMENT DUE BY: <b>09-06-06</b> DELINQUENT AFTER <b>09-14-06</b>					

Aug  
Bill  
photo  
8/24/06

EXHIBIT  
2







08.15.2006

EXHIBIT

4

tabbles

8/15/06

This is to certify that the Labor Tribune took a photo of my gas meter reading on this date which is 1188.

Signature: Steve White

Witness: Ed Inghel

8/28/06

This is to certify that the Labor Tribune took a photo of my gas meter on this date and it is still reading 1188, the same reading it was on 8/15/06.

Signature: Steve White

Witness: Ed Inghel

