# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

USW Local 11-6		)
	Complainant,	)
V.		) Case No. GC-2006-0390
Laclede Gas Company,	D 1 4	)
	Respondent.	)

## LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF CROSS AND ORDER OF OPENING STATEMENTS

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and submits, on behalf of all of the Parties, the following Issues List, Order of Witnesses, Order of Cross and Order of Opening Statements:

- 1. On April 10, 2006, USW Local 11-6 filed a Complaint against Laclede Gas Company (Laclede or Company) with the Missouri Public Service Commission (Commission).
- 2. On May 11, 2006, Laclede filed its Motion to Dismiss Complaint or, in the Alternative, Motion for a More Definite Statement, and Motion to Strike Request for Relief and, in the Alternative, Answer to Complaint.
- 3. On May 30, 2006, USW Local 11-6 filed its Opposition to Laclede's Motion to Dismiss Complaint or, in the Alternative, Motion for a More Definite Statement, and Motion to Strike Request for Relief.
- 4. On June 8, 2006, Laclede filed its Response to the Union's Opposition to Laclede's Motions.
- 5. On August 10, 2006, the Commission issued an Order Denying Motion to Dismiss, Granting Motion for More Definite Statement, Granting Motion to Strike, in Part, setting Procedural Teleconference, and Directing Filing.

- 6. The Parties filed a Proposed Procedural Schedule on August 21, 2006.
- 7. The Procedural Schedule was subsequently modified by Commission Order on September 8, 2006.

# **LIST OF CONTESTED ISSUES**

- A. Has the installation of AMR modules by Laclede violated Section 393.130.1 RSMo (safety and/or adequacy) or any gas safety law, rule, order, or decision of the Commission?
- B. If so, what is the appropriate remedy?

#### **ORDER OF WITNESSES**

# Live Demonstration

USW Local 11-6:

Steve McFarlane Phil Gozy;

David Lay Frank Meuting (live and/or through deposition)

Pat White Dean Carlton

Mark Boyle Everet Minton

Don Vierling Kevin Stewart

Brian Johnson Jonathan Guelich

Claire Donnelly (through deposition) Debra Redepenning (through deposition)

Fred Baras Steve White

Mary Hall George Waites

Kathy Waites Tim Daley

Toby Kepner Linda Tierney

Marilyn Jean Kessler Grace Forbes

a.  $Staff^2$ :

Gay Fred Robert Leonberger

b. <u>Laclede</u>:

Clark Korbisch Patrick Seamands

## **ORDER OF CROSS-EXAMINATION**

Local 11-6 witnesses: Office of Public Counsel (OPC), Staff, Laclede;

Staff witness: Laclede, OPC, Local 11-6;

Laclede witnesses: Staff, OPC, Local 11-6

#### **ORDER OF OPENING STATEMENTS**

Local 11-6, OPC; Staff, Laclede

WHEREFORE, the Staff, on behalf of itself and the other Parties, respectfully requests the Commission issue an Order adopting the Proposed List of Issues, Order of Witnesses, Order of Cross-Examination and Order of Opening Statements.

<sup>&</sup>lt;sup>1</sup> If such deposition testimony is approved by the Commission.

<sup>&</sup>lt;sup>2</sup> Staff will also be offering parts of the depositions of Frank Meuting, Robert Leonberger, Debra Redepenning and Clark Korbisch.

Respectfully submitted,

## /s/ Robert V. Franson

Robert V. Franson Senior Counsel Missouri Bar No. 34643

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 526-7779 (Telephone)
(573) 751-9285 (Fax)
robert.franson@psc.mo.gov

# **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronic mail to all counsel of record this  $22^{nd}$  day of November 2006.

/s/ Robert V. Franson