

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

USW Local 11-6	)	
	Complainant,	)
v.		) Case No. GC-2006-0390
		)
Laclede Gas Company,	)	
	Respondent.	)

**LACLEDE GAS COMPANY’S REQUEST  
TO MAKE A LIVE DEMONSTRATION FOR THE COMMISSION  
OF HOW AN AUTOMATED METER READING DEVICE IS INSTALLED**

COMES NOW Laclede Gas Company (“Laclede” or “Company”) and in support of its Request to Make a Live Demonstration of How an Automated Meter Reading Device is Installed, states as follows:

1. On April 11, 2006, Laclede received a Notice of a Complaint filed in this case by USW Local 11-6 (“Local 11-6” or “Union”). In its Complaint, the Union alleged, based solely “upon information and belief,” that adequate training was not being provided to the individuals who were installing automated meter reading (“AMR”) units on Laclede’s residential meters and that numerous instances of gas leaks had resulted from these installations. The Union requested that the Commission order Laclede to: (i) immediately begin using its own trained “non-managerial” personnel (i.e. Union members) to install, or supervise the installation of, AMR units; and (ii) have its trained “non-managerial” personnel promptly inspect each meter already installed by CellNet, the party contracted by Laclede to provide AMR service.

2. Based on a review of its own records, Laclede has been unable to find any evidence to support the contention that the installation of AMR devices, by CellNet, its installers, or by Laclede's own Union employees, causes meters to leak. Nor has the

Union provided any information to Laclede that would substantiate such a contention. Moreover, the Union's failure to provide such information persists to this day, despite the Company's repeated efforts to determine whether there is any basis for these allegations.

3. Indeed, even before the Union's Complaint was filed, Laclede arranged a meeting between two senior officers of the Company and the Union's leadership in an effort to address their stated concerns regarding the installation of these devices. When asked to provide specific examples of where the installation of an AMR device had caused a meter to leak, however, the Union did not provide one. After the Union filed its Complaint, the Company similarly filed a pleading asking that the Union be required to provide specific examples of where the installation of AMR devices had resulted in leaks at meters, or that its Complaint be dismissed. Again, no such information was forthcoming from the Union. And since that time, personnel from Laclede's Industrial Relations Department have met with the Union's leadership with the same goal of obtaining such information and with the same result of nothing being provided.

4. Laclede has asked for this information because it, like the Commission, places the utmost priority on ensuring the safety of Laclede's customers. To that end, both the Company and the Commission have a vital interest in obtaining any information that would show whether public safety is, in fact, being compromised by a particular procedure or practice, whether that practice is related to the installation of AMR devices or something else. On each and every occasion, however, the Union has consistently failed to provide any addresses, locations, customer names, or any other specific information that would allow either the Company or the Commission to determine whether there is any basis for its claims or any reason to take any corrective action.

Moreover, the Union has failed to do so even though it alleges that this is a serious safety concern and its own members are the very field employees who are specifically charged with detecting, reporting and repairing any leaks on the Company's facilities and thus would have access to such information *if* it existed.<sup>1</sup> It is not difficult to determine why this persistent and ongoing failure has occurred. The fact remains that installing AMR devices *cannot*, as a matter of simple mechanics, cause a leak on a meter because the installer does not access the meter at a point where the flow of gas is involved, but instead mounts the AMR device on the surface of the meter using the same screw holes that were used to hold the old index in place.

4. Unfortunately, the complete absence of any supporting information has not deterred the Union from repeating these baseless allegations in whatever public forum it can. To the contrary, the Union has continued its efforts to disparage the Company, alarm the public and misinform policy-makers with a transparent goal of preserving unnecessary union work at the expense of Laclede's customers.

5. Laclede believes that it must confront this campaign of misinformation with the truth to ensure that consumers and policy-makers are no longer victimized by scare tactics that needlessly and recklessly alarm them with allegations that have absolutely no basis in fact. To that end, Laclede requests that the Commission schedule an on-the-record presentation as soon as reasonably possible so that Laclede can demonstrate for the Commission itself how simple and safe the AMR installation process is, how it does not and cannot cause leaks on the meter, and how it has been performed

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<sup>1</sup>The Union's failure to substantiate its safety allegations in this case is very similar to its recent failure to back up its claims regarding Laclede's use of the Grunsky bag to perform meter changeouts. In that complaint case, the Union's inability to support its safety claims led it to dismiss its complaint the same week that its direct testimony was due. See Case No. GC-2006-0313.

literally millions of times by Cellnet and its installers (and by many other vendors) throughout the country without creating any danger to public safety.

6. Finally, Laclede continues to believe that the instant complaint should be dismissed for all of the reasons stated in its earlier pleadings. Accordingly, this request to make a live demonstration of how an AMR device is installed should not be construed as a waiver of Laclede's previous motion requesting such action.

WHEREFORE, for the foregoing reasons, Laclede respectfully requests that the Commission grant the Company's request to schedule an on-the-record presentation so that it can make a live demonstration of how an automated meter reading device is installed.

Respectfully Submitted,

/s/ Michael C. Pendergast

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**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing pleading was served on the Complainant, the General Counsel of the Staff of the Missouri Public Service Commission, and the Office of Public Counsel on this 7th day of August, 2006 by United States mail, hand-delivery, email, or facsimile.

/s/ Rick Zucker