

STATE OF MISSOURI  
PUBLIC SERVICE COMMISSION

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

**LOCAL 11-6's SUBMISSION OF JIM JOHNSON'S DEPOSITION TESTIMONY**

COMES NOW USW Local 11-6 ("Local 11-6"), by counsel, and hereby files as surrebuttal the following excerpts from Jim Johnson's deposition testimony to address the issues noted:

1. Laclede's contention that the leak was not dangerous:
  - a. p. 74 lines 9-11
  - b. p. 76 lines 11-20
  - c. p. 82 lines 16-18
2. Laclede's contention in its Opposition to Local 11-6's Motion for Immediate Relief, p. 7, that the leak was clearly not dangerous because Jim Johnson was smoking near it.
  - a. p. 80 lines 17-22
  - b. p. 117 line 19 through p. 118 line 2
3. Laclede's contention that a flat-headed screw or bolt or taper tap could not cause the leak.
  - a. p. 151 line 14 through p. 152 line 17
  - b. p. 186 lines 9-13
  - c. p. 103 lines 7-15

- d. p. 107 line 17 through p. 108 line 8
  - e. p. 150 line 14 through p. 151 line 3
  - f. p. 104 lines 20-22; p. 105 line 6 through p. 106 line 3
4. Laclede's contention in its Rebuttal Testimony of Patrick A. Seamands, p. 4 line 5, that both bolts were 5/16" wide.
- a. p. 106 line 8 through p. 107 line 22
5. Laclede's contention that a Laclede employee could have caused this leak.
- a. p. 185 line 24 through p. 186 line 3
  - b. p. 153 line 22 through p. 155 line 24
  - c. p. 157 lines 5-17
6. Laclede's contention that AMR installers do not create leaks.
- a. p. 44 lines 3-25
  - b. p. 45 line 19 through p. 48 line 4
  - c. Also see generally the testimony of Pat White and Mark Boyle regarding prior drill-throughs, the testimony of Gloria Haarmann regarding meter shop returns, the testimony of Dean Carlton, and the supplemental testimony of Mark Boyle. See also other testimony and evidence submitted in this manner.
7. Laclede's and the Staff's apparent contention that Jim Johnson does not have the knowledge to testify credibly about the gas leak.
- a. p. 129 line 25 through p. 130 line 18
  - b. p. 131 line 23 through p. 133 line 1
  - c. p. 134 line 4 though p. 135 line 15

- d. p. 27 lines 21-25; p. 28 lines 18-23; p. 29 lines 3-13
- e. p. 140 line 21 through p. 141 line 9

**WHEREFORE,** Local 11-6 respectfully submits the above excerpts from Jim Johnson's deposition 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](mailto:saschroder@hstly.com) (E-mail)

[jmartin@hstly.com](mailto: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 January 30, 2007, by United States mail, hand-deliver, email, or facsimile upon:

General Counsel Office  
Missouri Public Service Commission  
[GenCounsel@psc.mo.gov](mailto:GenCounsel@psc.mo.gov)

Lewis Mills  
Office of Public Counsel  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

Marc Poston  
Office of Public Counsel  
[marc.poston@ded.mo.gov](mailto:marc.poston@ded.mo.gov)

Robert Franson  
Missouri Public Service Commission  
[robert.franson@psc.mo.gov](mailto:robert.franson@psc.mo.gov)

Michael C. Pendergast  
Vice President – Associate General  
Counsel of Laclede Gas Company  
[mpendergast@lacledegas.com](mailto:mpendergast@lacledegas.com)

Rick Zucker  
Laclede Gas Company  
[rzucker@lacledegas.com](mailto:rzucker@lacledegas.com)

/s/ Sherrie A. Schroder \_\_\_\_\_