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	)	

SUPPLEMENTAL AFFIDAVIT OF DEAN CARLTON

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

Dean Carlton, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 5 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal 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.

Dean Carlton

Subscribed and sworn to before me this 16 day of November, 2006.

Hannah M. Merritt
Notary Public

HANNAH M. MERRITT
Notary Public - Notary Seal
State of Missouri
County of St. Louis
My Commission Exp. 04/07/2008

My commission expires _____

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SURREBUTTAL TESTIMONY

OF

DEAN CARLTON

SUBMITTED ON BEHALF OF USW 11-6

LACLEDE GAS COMPANY

CASE NO. GC-2006-0390

Q. Please state your name.

A. My name is Dean Carlton.

Q. Are you the same Dean Carlton who provided direct testimony in this matter?

A. Yes.

Q. What is the purpose of your surrebuttal testimony?

A. To address the rebuttal testimony presented by Laclede and the Staff.

Q. Dr. Seamands testified at p. 12 that your testimony over safety concerns about leak testing AMR meters is untruthful. How do you respond?

A. Dr. Seamands' testimony reflects that he lacks field experience. When the AMR program was first implemented, Laclede employees raised the issue that it was impossible to spot the meters because the dial movement was erratic. Initially, Laclede responded and instructed service employees to replace the AMR meters with erratic dials movement. This policy was implemented for around two weeks, then management instructed us to ignore erratically turning AMR meters.

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In order to counter this erratic movement, Laclede instructed us to spot the half-foot and two-foot meters on the upswing. We are instructed to spot these hands for five minutes, not the several seconds Dr. Seamonds testified to.

However, even this method is insufficient because the dials on AMR meters turn erratically *all the way around*, not just on the downswing. This is a clear change from the way dials worked before the current AMR system. In the past, when test dials jumped, it was only in the first quadrant of the dial, so spotting the meter on the upswing was effective. Additionally, I used to repair the previous trace devices, and these meters would not turn erratically, *even when the trace device was not aligned properly with the drive axle*.

Unlike meters before the implementation of the current AMR system, meters bearing AMR devices routinely jump erratically all around the dial. I now see AMR meters with erratic, spinning dials on a daily basis. This makes it difficult or impossible to get a sustained reading of gas consumption that would reflect a leak. My biggest concern is that the lack of this safety measure during turn-ons will result in service employees missing leaks and allowing the gas to be turned on despite a leak.

Q. Dr. Seamands testified that "tiny, slow leaks that squeeze out of a worn gasket or seal . . . . are so small that they dissipate in the atmosphere before they can ever present a hazard" (p. 5) and that "if there is a leak on [an AMR] meter, it usually results from wear on one of these gaskets or seals that *is* designed to keep the gas in the meter." (p. 6) He concludes that these

leaks are non-hazardous. (p. 7) In your experience, how does Laclede differentiate leaks between hazardous and non-hazardous?

A. Laclede's policies require that any gas consumption reflected when we spot a meter *must* be isolated, hazarded, tagged and locked. In other words, we must eliminate *any* leak we find, no matter the size. A copy of that policy, Section 19-10 of the Laclede Service Department Manual is attached and incorporated here as Exhibit 1.

Q. How does Laclede enforce that policy?

A. Laclede disciplines employees who miss leaks. In my role as a union steward, I am aware of two recent examples, ** ** and ** **, both of whom were suspended for leaving leaks on the job. In both cases, there is no indication that the leaks were large. Both employees had spotted the meter as required by Laclede policy. A copy of that policy, Section 19-8 of the Laclede Service Department Manual is attached and incorporated here as Exhibit 2. In both cases, the spotting was ineffective and the leaks were subsequently found through the use of a u-gauge or manometer. Although all Service Department employees carry a manometer, Laclede prefers us to spot check for leaks and that is the written policy we are to follow. However, in my experience, spot checking is ineffective on AMR meters. The situations that ** ** and ** ** were suspended over seem to bear out my experience.

Q. Dr. Seamands supports his theory that centerbox leaks are non-hazardous by noting that index covers are vented to let gas out. (p. 6) What do you think?

A. First, I should note that the leaks Dr. Seamands refers to as centerbox leaks are sometimes referred to by union members as leaks at the faceplate. In any event, his statement is inaccurate. Prior to AMR, index dial glass sometimes filled up with water for the very reason that it was not vented.

Q. You have read Dr. Seamands' response to your testimony about the billing implications of AMR meters with erratically spinning dials, that the spinning dial has no impact on billing accuracy. How do you respond?

A. I noticed that Dr. Seamands did not dispute that the spinning of the dials means that there is no way to confirm that the AMR computer chip is operating correctly, meaning that customers will have to rely on Laclede's word when receiving their gas bill. That was my point about billing accuracy. I have no way of knowing at this time whether the AMR device can read the meter accurately despite the spinning dial, except to note that I have been called out on a large number of high bill complaints for AMR meters and I have found that the manual read varies greatly from Cellnet's data about the AMR read.

Q. The Staff has raised concerns that the Union has been accumulating evidence of AMR problems without notifying Laclede. Is that accurate?

A. No. I have repeatedly raised these issues about AMR with Laclede management in my role as a Union steward. Laclede management did not want to hear about it. Laclede management's response to my concerns, as well as with other safety issues I have raised — has seemed to be to hold me to a higher standard than others in order to discourage me from coming forward.

Q. Does this conclude your surrebuttal testimony?

A. Yes.

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