


**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

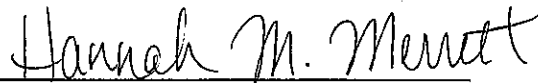
STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

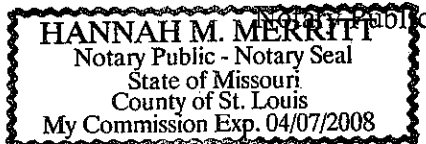
Dean Carlton, of lawful age, on his oath states: that he has participated in the preparation of the following Surrebuttal Testimony in question and answer form, consisting of 5 pages of Surrebuttal Testimony to be presented in the above case, that the answers in the following Surrebuttal Testimony were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





My commission expires _____

NP

SURREBUTTAL TESTIMONY
OF
DEAN CARLTON
SUBMITTED ON BEHALF OF USW 11-6
LACLEDE GAS COMPANY
CASE NO. GC-2006-0390

1 **Q. Please state your name.**

2 A. My name is Dean Carlton.

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

5 A. Yes.

6 **Q. What is the purpose of your surrebuttal testimony?**

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

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

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

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

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

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

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

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

3 A. Laclede's policies require that any gas consumption reflected when we spot a
4 meter *must* be isolated, hazarded, tagged and locked. In other words, we must
5 eliminate *any* leak we find, no matter the size. A copy of that policy, Section 19-
6 10 of the Laclede Service Department Manual is attached and incorporated here
7 as Exhibit 1.

8 **Q. How does Laclede enforce that policy?**

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

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

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

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

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

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

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

23 **Q. Does this conclude your surrebuttal testimony?**

1 | A. Yes.