

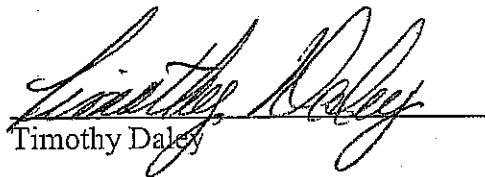
BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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

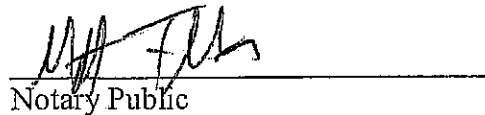
AFFIDAVIT OF TIMOTHY DALEY

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

Timothy Daley, of lawful age; on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 3 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct 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.


Timothy Daley

Subscribed and sworn to before me this 6th day of Sept., 2006.


Notary Public

My commission expires 1-29-08



MATT TILTON
St. Louis County
My Commission Expires
January 29, 2008

DIRECT TESTIMONY
OF
TIMOTHY DALEY
SUBMITTED ON BEHALF OF USW 11-6
LACLEDE GAS COMPANY
CASE NO. GC-2006-0390

Q. Please state your name and address.

A. My name is Timothy Daley and my address is ~~**~~ ~~**~~
MO 63017. I have resided at this address since 1992.

Q. When did you first hear about the installation of AMR devices by Honeywell subcontractors?

A. I had heard about the installation of AMR devices by Honeywell subcontractors from articles in the Labor Tribune. Attached and incorporated as Exhibit 1 is a true and accurate copy of one of these articles.

Q. When did you first receive notice that an AMR device was going to be installed on your meter?

A. On February 24, 2006, I received a letter from Laclede at my address stating that a Honeywell subcontractor will install an AMR device on my meter. At 3:00 p.m. that day, I called Laclede and asked to have a union gasworker install the AMR device. The customer service representative stated that the request would be noted in a memo.

Q. Why did you request to have the AMR device installed by a union Laclede gasworker?

A. From my experience as a union pipe insulator, it is my understanding that Laclede gasworkers receive substantial safety training and utilize equipment superior to that used by Honeywell subcontractors. Accordingly, I believe it is safer to have an AMR device installed on my gas meter by a union gasworker rather than by a Honeywell subcontractor.

Q. Was the AMR device then installed as you requested?

A. No. On August 16, 2006, while I was mowing the lawn, I noticed that an AMR device had been installed on my meter. No hang-tags were left on my door, and to my knowledge, no one had knocked on my door to alert me of the installation. I found this to be very unprofessional, as I have a wife and son at home who may have been alarmed by a stranger walking on the premises.

Q. Do you know when the AMR device was installed?

A. The AMR device must have been installed sometime between July 22, 2006 and August 16, 2006. It could not have been installed before July 22, 2006 because on that date, a Laclede Gas meter reader performed a standard meter reading.

Q. Did you complain to Laclede?

A. On August 16, 2006, after two unsuccessful attempts to reach Laclede at 314-621-6960, I called the Laclede Gas General Office at 314-342-0500. The receptionist took my information concerning the AMR installation and said a supervisor would call later that evening. On August 17, 2006, Sharon Luna from the Laclede Gas PR Department called and left her phone number with my wife. I called and

left three messages with Ms. Luna concerning the AMR installation. She finally returned my call that day at 5:00 p.m. Ms. Luna confirmed that the AMR device had been installed by a Honeywell subcontractor. She noted that because the AMR installation had been contracted out, it was not the Laclede gasworkers' job to perform the installation. I informed her that I found this response unsatisfactory because the AMR devices are ultimately connected to the Laclede meter. Therefore, I cannot understand why I was unable to have a gasworker install the AMR device. I did not feel that my concerns were being addressed, so I decided to terminate the conversation.

Q. Are you an employee or member of USW Local 11-6, or to your knowledge are you related by blood or marriage to any USW Local 11-6 officer or business representative?

A. No.

Q. Does this conclude your direct testimony?

A. Yes.