

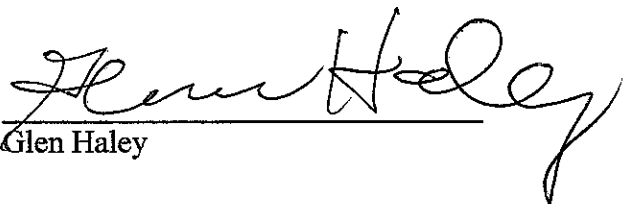
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

AFFIDAVIT OF GLEN HALEY

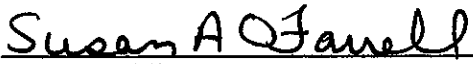
STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

Glen Haley, 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 4 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.



Glen Haley

Subscribed and sworn to before me this 25th day of Oct., 2006.



Notary Public

My commission expires _____

SUSANA O'FARRELL Notary Public - Notary Seal STATE OF MISSOURI Commissioned for St. Louis County My Commission Expires: Dec. 19, 2009 Commission Number 05399356

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

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

2 A. My name is Glen Haley.

3 **Q. What is your current place of employment and how long have you worked**
4 **there?**

5 A. I am currently employed by Laclede Gas Company (Laclede) in the Meter
6 Department as the appointment clerk. I will complete my 32nd year with Laclede
7 on October 14, 2006.

8 **Q. Have you held any officer or executive board positions in USW 11-6?**

9 A. Yes, I am currently the Meter Reader Shop Steward and a member of the
10 Executive Board.

11 **Q. What are your job duties as appointment clerk?**

12 A. I work in the office at Laclede's corporate office at 720 Olive Street, St. Louis,
13 MO 63101 setting up meter reading appointment routes, which are routes in
14 which a meter is read at a specific time because of a customer billing dispute, a
15 customer inquiry, or some other reason.

16 **Q. What, if any, actual meter reading do you perform?**

NP

1 A. I perform meter reading sometimes on Saturdays when meter readers are offered
2 overtime. Even some Saturdays I work in the office as appointment clerk. I
3 believe I have worked in the field reading meters on more than 20 Saturdays in
4 2006.

5 **Q. What, if any, exposure have you had to AMR meters on Saturdays.?**

6 A. I have manually read some AMR meters on most of the routes I have performed
7 this year, since AMRs have been installed comprehensively throughout Laclede's
8 service area.

9 **Q. What has been your personal experience with AMR meters in the field?**

10 A. I have seen AMR meters in a variety of states. Some are in perfect shape, some
11 have the dial hands stuck, and some appear to have been misprogrammed at
12 installation.

13 **Q. What makes you believe those meters have been misprogrammed at**
14 **installation?**

15 A. The meter dial is registering usage, but the dial reading is not consistent with the
16 reading Cellnet is receiving through the AMR's UDL unit.

17 **Q. How do you know the meter dial reading is inconsistent with the UDL**
18 **reading?**

19 A. When I read an AMR meter, I almost always make a verification call on my cell
20 phone from the meter site to obtain a comparison with the UDL reading. That
21 way I know before I leave whether or not the meter face is in sync with the UDL.

22 **Q. What other experience, if any, have you had with the AMR device through**
23 **your customary job duties?**

1 A. In my position as appointment clerk, I am given memoranda from Customer
2 Accounting reflecting meter usage that appears improbable in order to route the
3 meter to be re-read. This practice started after the installation of AMR devices
4 started. For example, a memorandum was issued about the residential account of
5 meter reader employee ** **, when his UDL-based usage reflected
6 that he had approximately \$11,000 in usage in one month. In that case, Laclede
7 assigned ** ** to re-read his own meter, then Cellnet re-set the meter to
8 the correct usage starting point. I receive memoranda like this on a daily basis
9 now. I have not been able to assign those out as much in the months of August
10 and September of this year, however, because the meter reading department is so
11 short-handed due to Laclede's ongoing elimination of the meter reader position
12 that we are concentrating on the industrial accounts. The industrial meters
13 generally do not and will not have AMR devices installed.

14 **Q. Have you had any other experience with AMR devices in the ordinary course**
15 **of your job duties?**

16 A. Yes, I am also aware that Laclede has assigned approximately 10 extra employees
17 from the billing department on a daily basis to customer accounting to re-bill
18 customers since the advent of AMR. Not only is this occurring daily, the
19 customer accounting department has regularly been working mandatory overtime.
20 I know this because Customer Accounting works on the same floor that I do, the
21 12th floor.

22 **Q. Have you had any other experience with AMR devices in the ordinary course**
23 **of your job duties?**

1 A. Yes, I personally witnessed two discussions between meter reader Steve White
2 and his supervisor, Mitch Hellickson, concerning the malfunctioning of Steve's
3 meter after installation of an AMR device. Mitch told Steve that he should not be
4 concerned about the reading on the face of his meter, because Laclede was relying
5 on the UDL unit inside the AMR device for the actual reading. Eventually, Mitch
6 agreed to have a Cellnet subcontractor go to Steve's house to fix his stuck meter.

7 **Q. What is your experience with Laclede's record-keeping practices in regard to**
8 **customer accounts?**

9 A. Laclede keeps better records than anyone I have ever seen. On the 12th floor
10 where I work, Laclede has boxes of records piled high that go back for at least
11 one year. These records are stored by date and should include, among other
12 things, all the memoranda I mentioned earlier about improbable billing resulting
13 from an AMR installation and service employee work orders for leaking AMR
14 meters. Each service employee work order contains a written statement of the last
15 work performed at the customer's site, even when the last work was installation of
16 an AMR device. These records are generated by the dispatch board on the 9th
17 floor whenever a meter reader or customer calls in a leak.

18 **Q. Does this conclude your direct testimony?**

19 A. Yes.