


**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	)	

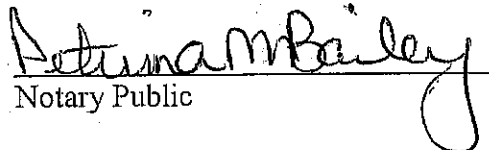
**AFFIDAVIT OF DEAN CARLTON**

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

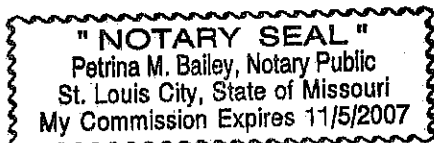
Dean Carlton, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 5 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him;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

  
Dean Carlton

Subscribed and sworn to before me this 22nd day of Sept., 2006.

  
Notary Public

My commission expires \_\_\_\_\_



**DIRECT 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 and address.

2   A.   My name is Dean Carlton and my address is \*\*               \*\* Farm Crossing,  
3       Imperial, MO 63052.

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

6   A.   I am currently employed by Laclede Gas Company and have worked there for  
7       sixteen years. At Laclede, I work in the Service Department as a general fitter.

8   **Q.**   What training have you received from Laclede?

9   A.   When starting at Laclede, I attended a two-week training program. I attended  
10       classes on leak investigations, operating a combustible gas indicator, how to  
11       detect leaks on appliances, and how to repair appliances. Furthermore, I receive  
12       ongoing instruction one or two times per year.

13   **Q.**   Do you hold any officer or executive board positions in USW 11-6?

14   A.   I have been a shop steward for two years.

15   **Q.**   What involvement have you had with AMR meters in the course of your  
16       duties at Laclede?

1 A. While working the emergency board, I have encountered three leaking meters  
2 equipped with AMR devices as well as other problems with such meters.

3 **Q. In these three cases, where were the leaks located?**

4 A. All three leaks were found on the gasket of the dial face.

5 **Q. Why were you called out to these addresses?**

6 A. Two of the customers had an AMR device installed that day and then smelled gas.  
7 I cannot remember why I was called out to the third address.

8 **Q. What did you do after finding the leaks?**

9 A. In each case, I replaced the leaking AMR meter with a new meter with a pre-  
10 installed AMR device.

11 **Q. What is your obligation to report these AMR meter leaks?**

12 A. In each of the three leaks mentioned above, I filled out a CIS form. This form has  
13 spaces for the customer's name, date, address, meter number, and order number.  
14 While I cannot remember exactly what I had written on each CIS, I noted that in  
15 two of the cases that a leak occurred shortly after the installation of an AMR  
16 device.

17 I have also felt compelled to report these three leaks to the PSC through the  
18 Union. The Union has compiled a list of AMR meters that leak or are not  
19 working properly. This list was attached as part of Exhibit 1 to the First Amended  
20 Complaint. The list was compiled by the Union through employees providing  
21 information to their stewards and Executive Board members. The names  
22 contained in the list consist of customers, Laclede Gas employees who performed  
23 the work, and Executive Board members who gathered the information.

1 As a shop steward, I have also collected the addresses of AMR leaks from other  
2 service employees and given it to the Union. I currently have four or five  
3 addresses at home that I have not yet given to the Union.

4 **Q. Have you found any other problems with AMR meters?**

5 A. While replacing old meters with a new meter with a pre-installed AMR device, I  
6 have encountered many brand new AMR meters where the dials do not turn  
7 smoothly. Instead, the dials on these new AMR meters skip, jump, stall, or turn  
8 erratically. In my opinion, the vast majority of AMR meters from the factory  
9 have this problem. In one case, when replacing a meter, I had to install eight or  
10 nine different new meters on which AMR devices were factory-installed before I  
11 found one where the dials would move smoothly. Additionally, AMR devices  
12 installed on existing meters by the Cellnet subcontractors have the same erratic  
13 dial movement problem.

14 **Q. What distinguishes the AMR meters that work properly from the AMR**  
15 **meters you just described?**

16 A. Some of the AMR meters I install have the AMR device installed in the  
17 metershop as opposed to coming directly from the factory. These meters usually  
18 have a red stamp on them. The dials on these meters tend to run much more  
19 smoothly than those coming directly from the factory.

20 **Q. What opinion do you hold, if any, as to why the dials on the AMR meters do**  
21 **not run smoothly?**

22 A. I am not certain, but in my opinion, there appears to be something wrong with the  
23 gears inside the AMR device that prevents the dials from running smoothly.

1 Q. What has Laclede directed the service employees to do with regard to the  
2 AMR meters with skipping dials?

3 A. At first, we continued to replace the AMR meters until we found one where the  
4 dials would not jump. It was during this time when I had installed eight or nine  
5 different new AMR meters before I found where the dials ran smoothly.  
6 Currently, however, Laclede has instructed us to leave the AMR meters in place,  
7 despite the fact that they have erratically spinning dials.

8 Q. What, if any, billing implications are caused by leaving these erratically  
9 spinning dials in?

10 A. The dials of the meter cannot be manually read because they spin erratically, so  
11 there is no way to confirm that the AMR computer chip is operating correctly. I  
12 have performed many manual reads for high bill complaints since the AMR  
13 devices have been installed, and the meter face reading does not even come close  
14 to what the AMR device reports. Therefore, customers will have to rely on  
15 Laclede's word when receiving their gas bill.

16 Q. What, if any, safety implications are caused by leaving these erratically  
17 spinning dials in?

18 A. Normally, service employees "spot" the meter to ensure that there are no leaks  
19 present. To spot the meter, you turn off the gas and then watch to see if the one-  
20 half foot hand moves. If the hand moves, it means that there is a leak because gas  
21 is flowing through the meter despite the fact that the appliances are turned off.  
22 However, the erratic spinning of AMR meters means that this check is no longer  
23 accurate. It can create false negatives if the dial is stalled while performing the

1 test. In this case, it will appear as if no gas is flowing through the meter while the  
2 gas is turned off (thus, no leaks), but the lack of dial movement is really due to the  
3 AMR device malfunctioning.

4 **Q. Have you brought these safety concerns to Laclede?**

5 A. Yes, but they have not changed their policy with regard to AMR meters.

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

7 A. Yes.