

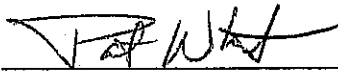
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

AFFIDAVIT OF PAT WHITE

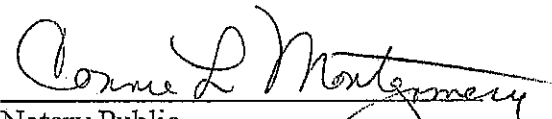
STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

Pat White, 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 6 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.



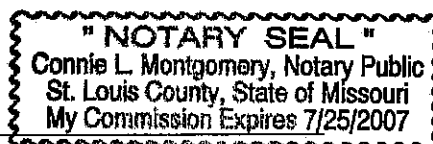
Pat White

Subscribed and sworn to before me this 21st day of Sept, 2006.



Notary Public

My commission expires _____



DIRECT TESTIMONY
OF
PAT WHITE
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 Pat White and my address is ~~St.~~ St. Louis, MO
3 63138.

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 fifteen years. At Laclede, I work in the Service Department.

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 the president of the Union for two and one-half years.

15 **Q. What steps do you take to detect leaks on a gas meter?**

1 A. I first use a Ranger gas detection device over the meter piping to determine
2 precisely where the leak is located. If there is any leak on the piping, I spray it
3 with a soapy water solution that bubbles if there is a gas leak. After checking the
4 piping, I then proceed to check the meter with the Ranger device.

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

7 A. In the course of my duties as a service employee, I have encountered many
8 leaking meters equipped with AMR devices. In those cases, the customer
9 typically complains of a gas odor emanating from the meter itself.

10 **Q. Where on the AMR meter do you typically find leaks?**

11 A. AMR meters usually leak below the dial glass.

12 **Q. In the leaking AMR meters you have encountered, how long after the AMR**
13 **installation do customers typically complain of gas leaks?**

14 A. In my experience, customers have usually complained of gas leaks within one
15 week of the AMR installation. Some customers even complain the same day of
16 the installation. However, I anticipate that as gas leaks get worse over time, more
17 customers will report them, although it may then be more difficult to attribute the
18 cause to the AMR installation.

19 **Q. Do certain types of meters leak more frequently after an AMR is installed?**

20 A. In my experience, leaks on AMR meters typically occur on older meters. Further,
21 certain meter models are more likely to leak after an AMR device has been
22 installed. The Lancaster 175 meter frequently leaks after the installation of an
23 AMR device. Additionally, certain Rockwell models also leak after an AMR

1 installation. It is my opinion that the AMR faces do not fit these meters, allowing
2 gas to leak from the meter through the AMR device.

3 **Q. In your opinion, how do leaks occur after the installation of an AMR meter?**

4 A. There is a rod inside gas meters that makes the dials spin. There is a gasket
5 around that rod that prevents gas leaks. An AMR device is installed with two
6 screws. In my opinion, a meter may leak if the gasket is not replaced correctly
7 after an AMR installation or if the AMR is screwed in too tightly, causing the dial
8 face to bend so that the gasket will no longer seal to the meter. Unlike Laclede
9 gasworkers, Cellnet subcontractors are not equipped to detect any gas leaks after
10 the installation of an AMR device. Therefore, any leaks occurring after the
11 installation go undetected until the customer discovers them.

12 **Q. What do you do after finding a leak on an AMR meter?**

13 A. After finding a leaking AMR meter, I replace it with a new meter with a pre-
14 installed AMR device. I then take the old meter back to my reporting location,
15 and it is eventually taken to the metershop.

16 **Q. What effect, if any, does the replacement of the meter have on billing**
17 **disputes?**

18 A. In the case of customers who were overbilled, Laclede's policy of total
19 replacement effectively deprives them of any evidence of overbilling.

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

21 A. After I have replaced a leaking meter, I fill out a CIS form. This form has spaces
22 for the customer's name, date, address, meter number, and order number.

1 Because there are blank spaces, a service employee can note the presence of a
2 leaking AMR device.

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

10 The list includes both meters I have personally worked on, and those reported to
11 me from other union members. While it contains over 350 entries, I believe that
12 this number is vastly under-representative of the amount of AMR meters actually
13 serviced for leaks and improper performance. This is likely due to either union
14 members forgetting to record a leaking AMR meter or declining to do so because
15 they do not want to get involved, possibly because they fear backlash from
16 Laclede.

17 **Q. What is your opinion on the dangerousness of the leaking AMR meters?**

18 **A.** In my opinion, any leaking AMR meter is dangerous, especially those located on
19 the inside. Because the AMR devices have only been installed within the last one
20 and one-half years, I predict that the number of leaks detected will grow in time.
21 This is because gas leaks tend to get worse over time and not better.

22 **Q. Where have you personally located AMR leaks?**

1 A. I have found AMR leaks at the following locations: ** an
2 apartment complex at **
3 and ** At ** I found leaks on the riser and I replaced the AMR
4 meter. At the apartment complex on ** the maintenance man
5 complained of a gas smell ever since the AMR device had been installed. I
6 arrived on March 16, 2006. There were approximately twenty meters in the area
7 of the leak complaint, and I found seven leaking meters. They were two-pound
8 meters which means more pressure flows through than a normal meter. I began to
9 replace the seven leaking meters but the job was finished by another service
10 employee. At ** the customer complained of a meter leak on the
11 outside meter. When I arrived on August 17, 2006, I found a meter on which an
12 AMR had been installed that had a leak at the bottom of the meter face. I
13 replaced the meter. At ** the customer complained that gas would not
14 flow to the appliances. I arrived on August 7, 2006 and found a meter that had an
15 AMR device installed. I checked the outlet of the meter (where the customer
16 service begins) and there was no gas flowing through. So I then checked the inlet
17 of the meter and gas was flowing through normally. This means that the meter
18 was not functional. So I replaced the meter and gas was able to flow to the
19 appliances. At ** the Cellnet installer complained of a gas odor
20 outside. When I arrived on January 17, 2006, the installer said that he had drilled
21 through the meter and caused the leak. I notified my boss and then replaced the
22 meter. I then performed my regular leak procedure on the inside. I also filled out
23 a damage to company property report and gave it to my foreman.

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

2 A. I have encountered damaged meters after the installation of an AMR device by
3 Cellnet. On May 25, 2006, I was called to investigate a gas odor at ~~**~~ **
4 ~~**~~ ~~**~~ in Chesterfield. I smelled a foreign odor in the garage. Upon inspecting the
5 meter, I saw that there were no hands on the meter dials. Therefore, it would be
6 impossible to tell if the meter was working or not. The customer told me that the
7 Cellnet installer had been there recently. I replaced this meter with a new meter
8 with a pre-installed AMR device. Further, on May 30, 2006, I was called to
9 investigate a gas odor on the meter at ~~**~~ ~~**~~ in University City. There, a
10 Cellnet subcontractor had called and said he smelled gas after installing an AMR
11 device. I found a leak on the riser and repaired it by replacing the piping. When I
12 ran gas through the old meter, the dials fell off of the gears inside the meter face.
13 It is possible that the installer did not screw the AMR device in correctly. I
14 replaced this meter with a new meter with a pre-installed AMR device and turned
15 the old meter into my foreman.

16 Q. Does this conclude your direct testimony?

17 A. Yes.