

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

In the matter of )

USW Local 11-6, )

Complainant )

and )

Laclede Gas Company, )

Respondent )

GC-2006-0390

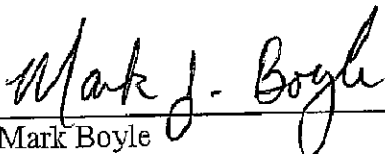
**AFFIDAVIT OF MARK BOYLE**

STATE OF MISSOURI )

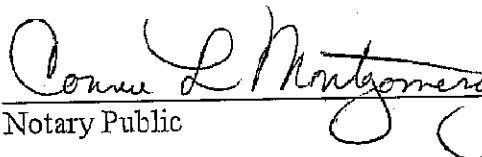
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COUNTY OF ST. LOUIS )

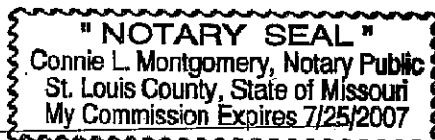
Mark Boyle, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 3 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him;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

  
Mark Boyle

Subscribed and sworn to before me this 25<sup>th</sup> day of September, 2006.

  
Notary Public

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



**DIRECT TESTIMONY**  
**OF**  
**MARK BOYLE**  
**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 Mark Boyle and my address is \*\*

3 \*\*.

4 Q. Who is your employer and how long have you worked there?

5 A. I am currently employed by Laclede Gas Company and have worked there for  
6 fourteen years.

7 Q. What is your position at Laclede Gas?

8 A. I work in the Service Department. I am a general fitter, which means that I work  
9 on residential, commercial, industrial and institutional piping.

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

11 A. I am a shop steward for the northern district and hold a position on the executive  
12 board of the union.

13 Q. What experience do you have with AMR meters?

14 A. I have been called out to repair leaking AMR meters while working in the Service  
15 Department. Upon finding a leaking AMR meter, I replace it with a new meter

1 with a pre-installed AMR device. I then take the old meter back to the North  
2 District. The old meter is eventually taken to the metershop.

3 Q. After encountering a leaking AMR meter, what would you do with that  
4 information?

5 A. After I have replaced a leaking meter, I fill out a CIS form. This form has spaces  
6 for the customer's name, date, address, meter number, and order number. I note  
7 that there was a leaking AMR device in the blank spaces on the sheet. I also fill  
8 out a meter change ticket that explains why I changed the meter. The meter  
9 change ticket accompanies the meter back to the metershop.

10 Additionally, I have written down the addresses where I had personally  
11 encountered AMR leaks and turned that information over to the union. I have  
12 also collected the addresses of AMR leaks from other service employees and  
13 given it to the union.

14 Q. Do any particular AMR leaks stand out in your memory?

15 A. Yes. On January 20, 2006, a Cellnet installer called in a leak at \*\*1

16 \*\*. Upon arriving at the scene, I found that the meter had been  
17 drilled through in an attempt to install an AMR device, thus causing a gas leak.  
18 The Cellnet installer who called in the leak was not present on my arrival.  
19 Instead, he had left the address with the meter obviously leaking.

20 I turned the gas off and I informed the customer that there was a gas leak. The  
21 customer said he was unaware that the Cellnet installer had even been on the  
22 premises.

1 As I was replacing the meter, the Cellnet installer returned. He told me that he  
2 had caused the leak at this address. I asked for his name and badge number,  
3 because it is Laclede's policy to collect this information every time a contractor  
4 damages Laclede property. However, the installer refused to give me his name or  
5 badge number.

6 I called my supervisor, Mike Sisak, to inform him of the damage. He told me not  
7 to fill out a F632 damage report. It is Laclede's policy to fill out a F632 report  
8 any time there is damage to company property. Therefore, I was surprised that I  
9 was told not to fill out the report. Failing to report the damage prevented  
10 documentation of this mistake made by the Cellnet installer.

11 **Q. Do you recall the particulars of any other AMR leaks?**

12 **A.** On August 24, 2006, I was approached by a customer while performing a job at  
13 another residence. He said that he smelled gas inside his house. I went to his  
14 house and my Sensit leak detector went off immediately. I called Laclede to  
15 report the leak. Service employee Andre Whitley replaced the meter at this  
16 address.

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

18 **A.** Yes.