

# PUBLIC SERVICE COMMISSION STATE OF MISSOURI

# IN THE MATTER OF: USW LOCAL 11-6 AND LACLEDE GAS COMPANY

Case Nos. GC-2006-0313 and GC-2006-0390

# **DEPOSITION OF ROBERT LEONBERGER**

JULY 6, 2006

Offices Missouri 🗖 Illinois 🛎 Kansas

HEADQUARTERS: 711 NORTH ELEVENTH STREET, ST. LOUIS, MISSOURI 63101 800.280.3376 www.midwestlitigation.com

	Page 1		Page 3
1	STATE OF MISSOURI	1	INDEX
2	PUBLIC SERVICE COMMISSION	2	Direct Examination by Ms. Martin 4
3	In the Matter of: )		Cross-Examination by Mr. Poston 64
	)	3	Redirect Examination by Ms. Martin 65
4	USW LOCAL 11-6, )		Cross-Examination by Mr. Zucker 65
1 -	)	4	Cross-Examination by Mr. Franson 67
5	and ) Case Nos. GC-2006-0313 ) GC-2006-0390		Further Redirect Examination by Ms. Martin 70
6	LACLEDE GAS COMPANY. )	5	Recross-Examination by Mr. Franson 71
7	Breeze ono commun. )	6	EXHIBITS INDEX
8	DEPOSITION OF ROBERT LEONBERGER,	7	Exhibit No. 1 Report and Order, Case No. GO-95-320 15
9	a witness, produced, sworn and examined on the 6th day of	8	Exhibit No. 2 Data Requests to Staff 26
10	July, 2006, between the hours of 8:00 a.m. and 6:00 p.m.	9	
11	of that day at the offices of the Missouri Public Service	10	
12	Commission, 200 Madison Street, in the City of Jefferson,	11	
13	County of Cole, State of Missouri, before	12	
14 15	KELLENE K. FEDDERSEN, RPR, CSR, CCR	13	
12	MIDWEST LITIGATION SERVICES	14	
16	3432 West Truman Boulevard, Suite 207	15	
1	Jefferson City, MO 65109	16 17	
17	(573)636-7551	18	
18	and Notary Public within and for the State of Missouri,	19	
19	commissioned in Cole County, Missouri, in the	20	
20	above-entitled cause, on the part of USW Local 11-6,	21	
21	pursuant to Notice.	22	
22		23	
23		24	
25		25	
	Page 2		Page 4
1			
	APPEARANCES	1	
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	FOR USW LOCAL 11-6: JANINE M. MARTIN Attorney at Law HAMMOND, SHINNERS, TURCOTTE, LARREW AND YOUNG, P. C. 7730 Carondelet Avenue, Suite 200 St. Louis, MO 63105 (314)727-1015 FOR LACLEDE GAS COMPANY (VIA TELEPHONE): RICK ZUCKER Attorney at Law Lackede Gas Company 720 Olive Street St. Louis, MO 63101 (314)342-0532 FOR THE OFFICE OF THE PUBLIC COUNSEL: MARC POSTON Senior Public Counsel P.O. Box 2230 200 Medison Street, Suite 650 Jefferson City, MO 65102-2230 (573)751-4857 FOR THE STAFF OF THE PUBLIC SERVICE COMMISSION: ROBERT FRANSON Senior Counsel JENNIFER HEINTZ Assistant General Counsel P.O. Box 360 200 Medison Street Jefferson City, MO 65102 (573)751-3234 SIGNATURE INSTRUCTIONS: Presentment waived; signature requested.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	ROBERT LEONBERGER, being sworn, testified as follows:         DIRECT EXAMINATION BY MS. MARTIN:         Q.       Would you state your name, please.         A.       Robert Leonberger.         Q.       And you are aware that you've been noticed         for deposition in connection with two separate complaints         filed by USW Local 11-6; is that correct?         A.       Yes.         Q.       And one of them is 2006-0313, which         involves the Grunsky bag method, and the other is         2006-0390, which involves the automated meter reading         program, correct?         A.       Yes.         Q.       Mr. Leonberger, who is your employer?         A.       Missouri Public Service Commission.         Q.       And how long have you been with that         employer?       A.       Got to calculate this. 25 years.         Q.       What is your present position?       A.         A.       I'm the assistant manager of the gas safety         engineering area.       Q.       What are your duties in that position?
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-4

Page 5 Page 7 municipal utilities for gas safety. breakup of the states. 1 1 2 Q. And have you had those same duties the 2 Q. And so the people you meet with are your 3 entire time that you've been employed by the PSC? 3 counterparts in other states? 4 I've had the supervisor's job since about 4 A. Yes, as well as the federal office of the Α. 5 1991. 5 Pipeline Safety people. 6 6 Q. Okay. And those people work for the Q. Okay. 7 7 Before that, I was an inspector with the Federal Government? Α. 8 department. 8 Α. Right. 9 q Were you always in gas safety? Q. Now, I wanted to ask you a couple of Q. 10 Α. Yes, I've always been in the gas safety 10 questions about gas incident reporting. The PSC, does the PSC receive reports of gas incidents from gas utilities in 11 area. 11 12 Do you belong to any professional 12 the state of Missouri? Q. 13 organizations whose focus are issues of gas distribution 13 A. Yes. Q. And how does that -- what is the -- is 14 or safety? 14 15 A. I'm a member of the National Association of 15 there a regulation in the State Code of Regulations that Corrosion Engineers. 16 requires that sort of reporting? 16 17 17 Q. And what is that? A. It requires a notification to the Staff of 18 It's a -- NACE is the acronym. It's a 18 certain incidents. Α. 19 national -- it's an international association of corrosion 19 0. What are the incidents that need to be 20 technicians and engineers that corrosion, one of the 20 reported? 21 21 aspects is the corrosion of pipelines. A. There's if it involves injury requiring 22 0. Do you have annual meetings or --22 hospitalization, if it involves a death, if it involves 23 There's annual meetings, but I haven't 23 property damage more than \$10,000. Α. 24 Q. Greater than 10,000. So if there is a gas 24 attended one of those for a while. 25 Q. Okay. Any other professional organizations 25 incident that does not cause any property damage, say for Page 8 Page 6 example there's a gas leak and the utility finds it, fixes related to gas distribution or safety? 1 1 the problem, nobody's hurt, that's not something that 2 2 Α. I was -- associations, the National 3 Association of Pipeline Safety Representatives. 3 would come to the attention of the PSC? 4 Often we have calls that we consider a 4 National Association of? Α. 0. 5 Α. Pipeline Safety Representatives. It's an 5 courtesy call, if the media is involved or something like that, but it's not required that they call unless it meets 6 organization of state pipeline safety managers like 6 7 myself. 7 one of those criteria. There's another criteria, if it 8 8 doesn't meet any of those specific criteria I just gave Q. Does that have a short thing? 9 NAPSR. 9 you, that if it is significant, quote, in the eyes of the Α. 10 ο. NAPSR. Does that association hold any 10 operator, that you call. 11 Q. Okay. 11 meetings? 12 Yes, there's regional meetings and national 12 But a lot of times we'll get calls from Α. Α. different operators because there's media involved. They 13 13 meetings. Do you attend those at all? just want us to know about it. 14 Q. 14 15 Yes. 15 Q. Okay. Α. 16 16 Q. How often? Α. That's not an incident report. It doesn't 17 17 I attend basically all the regional meet the definition of incident. Α. Q. When incident reports are filed on the 18 meetings annually and all the national meetings annually. 18 19 ones -- on the incidents that meet the qualifications 0. And what regional meeting is that? What 19 20 region is covered by the region? 20 you've just described to me, are those maintained by the 21 The NAPSR is broken up into regions the 21 PSC? Α. 22 22 same as the Federal Pipeline Safety regions. They have A. An incident report will be something different -- the Federal Pipeline Safety Organization has 23 that -- a Staff incident report is a report that the Staff 23 24 would file with the Commission. We would open a docket or 24 different regions, and Missouri's in the central region. 25 129 states in the central region. So we just mirror their 25 open a case number, and we would do an investigation and

#### 2 (Pages 5 to 8)

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1       then we would write a formal case, or write a formal         2       report.         3       Q. Okay.         4       A. And it would be filed here or filed with         5       the Commission, yes.         6       Q. And so those files are open to the public;         7       is that correct?         8       A. Yes.         9       MR. FRANSON: No.         10       THE WITNESS: The Staff incident reports         11       would be.         12       MR. FRANSON: Hold on. The Staff incident         13       report, but that's different than the entire file.         14       BY MS. MARTIN:         15       Q. Okay. So there may be certain parts of the         16       It's case file.         17       A. Correct. The Staff incident report is         18       available to the public?         14       BY MS, MARTIN:         15       Q. Okay. So there may be certain parts of the         16       It are not available to the public?         17       A. Correct. The Staff incident report is         18       available to the public?         19       Q. Okay. So there may be certain parts of the         16       It are not available to the public?			T	
2       report.       2       wasn't the fault or on the utility property side?         3       Q. Okay.       A. And it would be filed here or filed with         5       the Commission, yes.       A. Mod so those files are open to the public;         7       is that correct?       A. Nor.         8       A. Yes.       5         9       MR. FRANSON: No.       10         10       THE WITNESS: The Staff incident reports       10         11       would be.       10         12       MR. FRANSON: No.       10         13       roport, but that's different than the entiff file.       10         14       O'NAR WATNIX:       10       Q. So smaller incident stappen that door         15       officially reported to the PSC?       16       A. Oursec. The Staff incident report is         18       available to the public?       10       Q. Okay. So do you got data on overall leaks repaired for         16       file that are not available to the guilbic?       10       Q. Okay. So do you got data on overall leaks         18       avas situation, does timake a difference in terms of the user, sust a composite number of leaks repaired for       10       that the investigatual, no.         19       Q. Okay. So do you got data on overall leaks       2       repaired wouthy		-	,	Page 11 O Would that be mostly just to verify that it
3       Q. Okay.       3       A. Normally we would takk to the fire         4       A. And it would be filed here or filed with       4       department, the police department, the investigators         5       Q. And so those files are open to the public;       is that correct?       4       department, the police department, the investigators         8       A. Yes.       5       the fire marshals, to the out what happend. If         9       M.R. FRANSON: No.       9       investigator         11       would be.       9       indicators of something, we may not do a formal         12       MR. FRANSON: No.       9       indicators of something, we may not do a formal         13       report, but that's different than the entre file.       10       Q. So smaller incident reports         13       report, but that's different than the entre file.       11       indicators of something, we may not do a formal         14       BYMS. NARTIN:       12       east and thing Ske that would be in that       13       repart something like that, but individually, no.         15       GL Okay. So there may be certain parts of the       14       14       the year, something like that, but individually, no.         16       The when the SCS fills in oitfied of a -say       a significant property damage over \$10,000 as a resultor       2       A. There			1	
4       A. And it would be filed here or filed with         5       the Commission, yes.         6       Q. And so these files are open to the public;         7       is that correct?         8       A. Yes.         9       MR. FRANSON: No.         10       THE WTINESS: The Staff incident reports         11       would be:         12       NR. FRANSON: Hold on. The Staff incident         13       report, but that's different than the entire file.         14       BY MS. FNANTIN:         15       C. Okay. So there may be cortain parts of the         16       file that are not available to the public?         17       A. Correct. The Staff incident report is         18       available to the public?         19       File that are not available to the public?         10       Q. Citay. So do you get data on overall leass repaired for         18       available to the public?         19       File that are not available to the fully so would be         10       File that are not available to the public?         12       A. There's an annual report?         13       available to the public and the files would be in that         14       a spasituation, does it maka a differenone in terms of the		•		
5       the Commission, yes.       5       the Commission, yes.         6       Q. And so those files are open to the public;       is that correct?         8       A. Yes.       5       that char, if the fire marshals, to find out what happend. If         9       MR, FRANSON: No.       10       this particular picks broke and there's no other         11       would be.       10       Q. So smaller incidents that happen that don         12       PMR, FRANSON: No.       10       Q. So smaller incidents that happen that don         13       report, but that's different than the entire file.       11       involve injury or death, and by that I mean smaller         13       report, but that's different than the entire file.       12       leaks that would be -         14       Biffings, responses and things like that would be -       11       involve injury or death, and by that I hose things are of a says of the post in maybe overall leaks repaired for         14       a significant property damage over \$10,000 as a result of       12       A. There's an annual report, has leaks         14       roblem was on, say, a pipeline that's owned by the gars       2       Q. And when does the annual report?         15       problem was on, say, a pipeline that's owned by the company had       9       10         15       problem was on orif equipment that the company	1			-
6       Q. And so those files are open to the public;       is that correct?         7       is that correct?         8       A. Yes.         9       MR. FRANSON: No.         10       THE WITNESS: The Staff incident reports         11       involue injury or death, and by that I mean smaller         12       MR. FRANSON: Hold on. The Staff incident         13       report, but that's different than the entre file.         14       BY MS. MARTIN:         15       Q. Okay. So there may be cartain parts of the         16       file that are not available to the public?         17       A. Correct. The Staff incident report is         18       available to the public?         19       nilings, responses and things like that would be in that         20       officially reported to the PSC?         14       as significant property damage over \$10,000 as a result of         14       as significant property damage over \$10,000 as a result of         15       ontify us - notify us - notified of a - say         21       A. There's an annual report, annual repor		the Commission, ves.	5	
7       is bat correct?         8       A. Yes.         9       MK. FRANSON: No.         10       THE WITNESS: The Staff incident reports         11       would be.         12       MR. FRANSON: Hold on. The Staff incident reports         13       report, but that's different than the entire file.         14       BY MS. MARTIN:         15       G. Okay. So there may be certain parts of the         16       file that are not available to the public?         17       A. Correct. The Staff incident report is         18       available to the public?         19       Gings, responses and things like that would be in that         20       Case file.         21       Q. The when the cause let me strike that.         22       When the PSC Staff is notified of a say         23       a significant property dumage over \$10,000 as a result of         24       a gas situation, does It make a difference in terms of the gas         25       utility or on a furnace or a gas appliance that's wait the gas         10       Drice of Pipeline Safesy.         25       Q. Mad each separate gas utility files it so wn         3       asignificant property dumage diver situation due the requilation would have would be on         10				
8       A. Yes.       9       Indications of something, we may not do a formal         9       MR. FRANSON: No.       10       Q. So smaller incidents that happen that don         11       would be.       10       Q. So smaller incidents that happen that don         12       MR. FRANSON: Hold on. The Staff incident       11       investigation.         13       report, but that's different than the entre file.       11       10       Q. So smaller incidents that happen that don         14       BV MS. MARTIN:       11       10       Q. Kay. So there may be cortain parts of the         16       file that zre not available to the public?       A. Correct. The Staff incident report is       16       A. Only in maybe overall leaks repaired for         17       A. Correct. The Staff incident report is       10       Q. Okay. So do you get data on overall leaks         18       available to the public?       16       17       that year, yust a composite number of leaks repaired for         17       A. Correct. The Staff incident report is       17       that year, yust a composite number of leaks repaired for         18       available to the public?       17       that year, yust a composite number of leaks repaired for         19       Q. If - when the cause - if the strike that.       17       that year, yust a composite number of leaks repaired for<			[ _	· - · ·
9       MR. FRANSON: No.       9       investigation.         10       THE WITNESS: The Staff incident reports       10       Q. So smaller incidents that happen that don         11       would be.       11       investigation.       10       Q. So smaller incidents that happen that don         12       MR. FRANSON: Hold on. The Staff incident       11	1			
10       THE WITNESS: The Staff incident reports         11       would be.         12       MR. FRANSON: Hold on. The Staff incident         13       report, but that's different than the enthe file.         14       BY MS. MARTIN:         15       Q. Okay. So there may be certain parts of the         16       file that are not available to the public?         17       A. Correct. The Staff incident report is         18       available to the public, and the filings would be         19       Q. Okay. So there may be certain parts of the         16       filings, responses and things like that would be in that         20       case file.         21       Q. H when the cause lat me strike that.         22       a gas alignificant property damage over \$10,000 as a resultor         23       a significant property damage over \$10,000 as a resultor         24       A. There shale and ifference in terms of the gas         19       problem was on, say, a pipeline that's owned by the gas         2       utility or on a furnace or a gas appliance that the would have mode have make a difference to the gas         1       moliferent transce and fifterence in terms of the gas         1       p	F			
11       would be:       11       involve injury or death, and by that I mean smaller         12       MR. FRANSON: Hold on. The Staff incident       12       leaks that are found and captured by the gas comparison of the second and captured by the gas comparison.         13       report, but that's different than the entire file.       13       leaks that are found and captured by the gas comparison.         14       BY MS. MARTIN:       14       utility side property or equipment, those things are         15       Q. Okay. So there may be certain parts of the       16       A. Only in may be overall leaks repaired for         17       A. Correct. The Staff incident report is       available to the public?       17       that year, something like that, thorable comparison of equipment, those things are         18       available to the public?       18       that year, something like that, thorable comparison of equipment that the compary - the       19       Q. Okay. So do you get data on overall leaks         21       Q. If - when the cause let me strike that.       21       A. There's an annual report, has leaks         22       when the PSC Staff is notified of a - asy are       Q. And when does the annual report get filed         23       a significant property damage over \$10,000 as a result of       10       There's an annual report, has leaks         24       A. The notification, we would have that hone data on annual repo				
12       MR. FRANSON: Hold on. The Staff incident       12       leaks that are found and captured by the gas comparison of the port, but that's different than the entire file.         13       report, but that's different than the entire file.       13       report, but that's different than the entire file.         14       BY MS. MARTIN:       14       utility side property or equipment, those things are         15       officult report is       13       reparties of the public?         17       A. Correct. The Staff incident report is       14       utility side property or equipment, those things are         16       file that are not available to the public?       16       A. Only in maybe overall leaks repaired for         17       A. Correct. The Staff incident report is       18       the year, just a composite number of leaks repaired for         18       the year.       20       Q. And when does the annual report qet filed.         21       Q. May. So do you get data on overall leaks       20         23       a spasitization, does it make a difference in terms of the gas       21       A. There's an annual report qet filed.         23       utility or on a furnace or a gas appliance that was in the       2       Q. And when does sparte gas utility files its own         23       utility or on a furnace or a gas appliance that was in the       3       9       Page 10				-
13       report, but that's different than the entire file.       13       regardless of whether it's on the customer side or to utility side property or equipment, those things are 15         14       BY MS. MARTIN:       14       utility side property or equipment, those things are 15         15       O. Okay. So there may be certain parts of the 15       officially reported to the PSC?         16       file that are not available to the public?       A. Correct. The Staff incident report is 13         16       available to the public, and the filings would be       19         17       A. Correct. The Staff incident report is 14       14         18       available to the public, and the filings would be       19         19       officially reported to the PSC?       16         20       case file.       20         21       Q. If when the cause let me strike that.       22         23       as ginificant property damage over \$10,000 as a result of 1       17         24       a go situation, does it make a difference in terms of the 23       20       A. dwhen does the annual report 24 filed         24       utility or on a furnace or a gas appliance that was in the 25       20       Q. And each separate annual report 24         3       orbit orbit us so would have that knowledge, 24       10       0 offfice of pipeline Safety.       2	1			
14       BY MS. MARTIN:       14       utility side property or equipment, those things are         15       Q. Okay. So there may be certain parts of the       16         16       file that are not available to the public?       17         17       A. Correct. The Staff incident report is       18         18       available to the public, and the filings would be       19         19       filings, responses and things like that would be in that       20         20       If - when the cause let me strike that.       20         21       Q. If when the cause let me strike that.       21         23       a significant property damage over \$10,000 as a result of       21         24       a fill problem was on, say, a pipeline that's owned by the gas       21       A. There's an annual report, then we         25       send lit to we review lit, then send lit on to the Federal         26       A. M when does the annual report?         4       A. The notification, we would want them to       5         5       but the actual jurisdiction that we would be on       3         7       pippig that would be owned under the regulatry autority       7         8       of the commission or if equipment that the company had       9         9       persor file stove burst and there was	1		1	
15       Q. Okay. So there may be certain parts of the       15       officially reported to the PSC?         16       filling tare not available to the public?       16       A. Only in maybe coverall leaks repaired for         17       A. Correct. The Staff incident report is       16       A. Only in maybe coverall leaks repaired for         18       available to the public, and the fillings would be       19       Q. Okay. So do you get data on overall leaks         20       case file.       19       Q. Okay. So do you get data on overall leaks         21       Q. If when the cause let me strike that.       19       Q. Okay. So do you get data on overall leaks         23       as ginificant property damage over \$10,000 as a result of       21       A. There's an annual report, has leaks         24       a gas situation, does it make a difference in terms of the       22       repaired during the year.       23         25       utility or on a furnace or a gas appliance that was in the       24       A. The notification, we would want them to       26       A. The notification we would have that knowledge,       10		-	1	-
16       A. Correct. The Staff incident report is         18       available to the public, and the fillings would be         19       available to the public, and the fillings would be         19       fillings, responses and things like that would be in that         20       Case file.         21       Q. If when the cause let me strike that.         22       When the PSC Staff is notified of a say         23       a significant property damage over \$10,000 as a result of         24       aga situation, does it make a difference in terms of the         25       investigation whether the leak or the I'm sorry the         Page 10       Page 10         1       problem was on, say, a pipeline that's owned by the gas         2       utility or an af urace or ages appliance that was in the         3       customer's home?         4       A. The notification, we would want them to         5       notify us so we would want them to         6       but the actual jurisdiction that we would have would be on         7       pipping that would be owned under the regulatory authority         8       of the Commission or if equipment that the company had         9       matinuctioned or if actions by one of the operating         10       person fatereab train maybe leda	1		1	
17       A. Correct. The Staff incident report is         18       available to the public, and the filings would be         19       filings, responses and things like that would be in that         20 <b>Q. If when the cause let me strike that.</b> 21 <b>Q. If when the cause let me strike that.</b> 22 <b>When the PSC Staff is notified of a say</b> 23 <b>a significant property damage over \$10,000 as a result of</b> 24 <b>A. There's an annual report, etalting the year</b> .         23 <b>a gas situation, does it make a difference in terms of the ass situation, does it make a difference in terms of the ass situation, does it make a difference in terms of the ass some situation whether the leak or the I'm sorry the         19       <b>problem was on, say, a pipeline that's owned by the gas</b>         2       <b>utility or on a furnace or a gas appliance that was in the</b>         3       notification, we would have that knowledge,         6       but the actual jurisdiction that we would have would be on         7       piping that would be owned under the regulatory authority         8       or the commission or if equipment that the company had         9       pestonnel caused that.         11       <b>Q. Okay.</b>         12       <b>Q. Naky.</b>         13       <b>Q. Okay.</b>         1</b>	1		í	
18       available to the public, and the filings, responses and things like that would be in that       18       the year, something like that, but individually, no.         19       filings, responses and things like that would be in that       19       Q. Okay. So do you get data on overall leaks         21       Q. If when the cause let me strike that.       19       Q. Okay. So do you get data on overall leaks         23       as gignificant property damage over \$10,000 as a result of       a gas situation, does it make a difference in terms of the         24       a gas situation, does it make a difference in terms of the       in the year, something like that, but individually, no.         25       repaired during the year.       23       Q. And when does the annual report get filed         26       interest an annual report, the we       24       A. February. We get that in February, then we         26       utility or on a furnace or a gas appliance that was in the       2       Q. And each separate gas utility files its own         3       separate annual report?       4       A. Yes.       9         9       pipoing that would be owned under the regulatory authority       7       A. Miles of pipe, number of service line, lost and       9         9       pipoing that would be owned under the regulatory authority       7       A. Miles of pipe, number of service line, lost and         10		-	i i	
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14Q. Okay. Well, so if there's a problem on the14leaks per year, the number?15customer side, say a pipe in their home that maybe led to15A. There's a breakdown of there's four or16their stove burst and there was an incident, would that be16five different categories for the leak, what caused the17investigated?17leaks.18A. Possibly, but if it was clear that we found18Q. Do you know if the leaks that are reported19that the fire department said it was clearly a failure of19are leaks of a certain magnitude? I know in the20an inside pipe and it had nothing to do with the actions20regulations they talk about a Class 1, Class 2, Class 3.21of the company or the failure of the company facilities,21Does the breakdown that you're talking about separate th22we may not do a formal investigation.23A. No.23Q. Okay. Would you do an informal23A. No.24investigation?24Q. It's just all leaks?	12	A. Even though it may not be on the specific	12	Q. When you get the report, does it indicate
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22     we may not do a formal investigation.     22     out that way?       23     Q.     Okay. Would you do an informal     23     A.     No.       24     investigation?     24     Q.     It's just all leaks?	1.			
23Q.Okay. Would you do an informal23A.No.24investigation?24Q.It's just all leaks?	Į –			
24 investigation? 24 Q. It's just all leaks?	1			-
IZJ A. WE WOULD HILD OR WHAT HADDEDED, VPS IZJ A. RODE				
	25	A. We would find out what happened, yes.	25	o, Nyile .

3 (Pages 9 to 12)

		Page 13		Page 15
1	Q.	No matter how minor?	1	MS. MARTIN: Right. That's fine.
2	А.	Right.	2	MR. FRANSON: So as long as we can agree I
3	Q.	Okay.	3	can have a continuing objection?
4	А.	Well, I would say that there are a few	4	MS. MARTIN: Yes.
5	above-gro	ound small like fizz leaks on a meter set piping	5	BY MS. MARTIN:
6	that woul	d be considered a Class 4 leak that wouldn't	6	Q. That's right. And I should tell you, I am
7	be neo	essarily be required to be in that report.	7	only wanting your knowledge. I'm not actually going to
8	Q.	So Class 4 is the most minor?	8	quote you for what comes in there. I'm just sort of
9	А.	Right.	9	leading us up to the Grunsky bag set of questions.
10	Q.	Do the regulations require, to your	10	So the process or timing of meter
11	knowled	ge, the utilities, the gas utilities to perform gas	11	change-outs is something that's addressed by the statute?
12	safety in	spections on the customer side at any particular	12	A. It's addressed by the statute, and in
13	times?		13	Laclede's case and a number of the other gas utilities
14	А.	When the gas is physically turned on.	14	it's addressed by a waiver to the statute, as far as how
15	Q.	And that's what we call turn-ons, right?	15	the meter is changed out.
16	Α.	Right. When the gas is physically turned	16	Q. Okay. Why don't we in connection with
17	on, the co	ompany is required company or municipality is	17	that, let me just give you I guess we'll call it
18	required t	o go inside and do an inspection.	18	Exhibit 1, Union Exhibit 1.
19	Q.	And with a home sale inspection situation,	19	(UNION EXHIBIT NO. 1 WAS MARKED FOR
20	is that a	nother time when a gas safety inspection is done?	20	IDENTIFICATION BY THE REPORTER.)
21	Α.	It's not required then.	21	BY MS. MARTIN:
22	Q.	It's not required?	22	Q. I've handed you what is Plaintiff or Union
23	Α.	Right.	23	Exhibit No. 1, and it's a Report and Order in Case
24	Q.	Do you know if most of the utilities do it	24	No. G0-95-320; is that correct?
25	here in M	fissouri?	25	A. Yes.
·				
		Page 14		Page 16
	Α.	Page 14 I don't believe any of them do that, except	1	Page 16 O. Do you recall this case?
1 2	A. Laciede.	Page 14 I don't believe any of them do that, except	1	Page 16 Q. Do you recall this case? A. Yes.
				Q. Do you recall this case?
2	Laciede.	I don't believe any of them do that, except	2	<ul><li>Q. Do you recall this case?</li><li>A. Yes.</li><li>Q. And do you recall whether or not this case</li></ul>
2 3	Laclede. <b>Q.</b>	I don't believe any of them do that, except Laclede does them; is that right?	2 3	Q. Do you recall this case? A. Yes.
2 3 4	Laciede. Q. A. Q,	I don't believe any of them do that, except Laclede does them; is that right? Right.	2 3 4	<ul> <li>Q. Do you recall this case?</li> <li>A. Yes.</li> <li>Q. And do you recall whether or not this case</li> <li>involved issues dealing with the changing of meters?</li> </ul>
2 3 4 5	Laclede. Q. A. Q. to the PS	I don't believe any of them do that, except Laclede does them; is that right? Right. Do the gas utilities provide any statistics	2 3 4 5	<ul> <li>Q. Do you recall this case?</li> <li>A. Yes.</li> <li>Q. And do you recall whether or not this case involved issues dealing with the changing of meters? You know, let me rephrase that. What I understand this case to be on just correct me if I'm</li> </ul>
2 3 4 5 6	Laclede. Q. A. Q. to the PS hazards a	I don't believe any of them do that, except Laclede does them; is that right? Right. Do the gas utilities provide any statistics iC that discuss or address whether or not gas	2 3 4 5 6	<ul> <li>Q. Do you recall this case?</li> <li>A. Yes.</li> <li>Q. And do you recall whether or not this case involved issues dealing with the changing of meters? You know, let me rephrase that. What I understand this case to be on just correct me if I'm wrong. I'm not actually going to ask you any questions</li> </ul>
2 3 4 5 6 7	Laclede. Q. A. Q. to the PS hazards a during th	I don't believe any of them do that, except Laclede does them; is that right? Right. Do the gas utilities provide any statistics C that discuss or address whether or not gas are discovered or potential hazards are discovered	2 3 4 5 6 7	<ul> <li>Q. Do you recall this case?</li> <li>A. Yes.</li> <li>Q. And do you recall whether or not this case involved issues dealing with the changing of meters? You know, let me rephrase that. What I understand this case to be on just correct me if I'm</li> </ul>
2 3 4 5 6 7 8	Laclede. Q. A. Q. to the PS hazards a during th	I don't believe any of them do that, except Laclede does them; is that right? Right. Do the gas utilities provide any statistics iC that discuss or address whether or not gas are discovered or potential hazards are discovered uses gas safety inspections that are done at	2 3 4 5 6 7 8	<ul> <li>Q. Do you recall this case?</li> <li>A. Yes.</li> <li>Q. And do you recall whether or not this case involved issues dealing with the changing of meters? You know, let me rephrase that. What I understand this case to be on just correct me if I'm wrong. I'm not actually going to ask you any questions about it. But very</li> </ul>
2 3 4 5 6 7 8 9	Laclede. Q. A. Q. to the PS hazards a during th turn-on c	I don't believe any of them do that, except Laclede does them; is that right? Right. Do the gas utilities provide any statistics ic that discuss or address whether or not gas are discovered or potential hazards are discovered uese gas safety inspections that are done at or home sale inspections?	2 3 4 5 6 7 8 9	<ul> <li>Q. Do you recall this case?</li> <li>A. Yes.</li> <li>Q. And do you recall whether or not this case</li> <li>involved issues dealing with the changing of meters? You know, let me rephrase that. What I</li> <li>understand this case to be on just correct me if I'm</li> <li>wrong. I'm not actually going to ask you any questions</li> <li>about it. But very MR. FRANSON: I'm sorry. I can't I'm</li> </ul>
2 3 4 5 6 7 8 9 10	Laciede. Q. A. Q. to the PS hazards a during th turn-on o A. Q.	I don't believe any of them do that, except Laclede does them; is that right? Right. Do the gas utilities provide any statistics is that discuss or address whether or not gas are discovered or potential hazards are discovered uses gas safety inspections that are done at or home sale inspections? No.	2 3 4 5 6 7 8 9 10	<ul> <li>Q. Do you recall this case?</li> <li>A. Yes.</li> <li>Q. And do you recall whether or not this case</li> <li>involved issues dealing with the changing of meters? You know, let me rephrase that. What I</li> <li>understand this case to be on just correct me if I'm</li> <li>wrong. I'm not actually going to ask you any questions</li> <li>about it. But very MR. FRANSON: I'm sorry. I can't I'm</li> <li>going to have to object. A question correct me if I'm</li> </ul>
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	Page 17		Page 1
1	Q. Okay. And at the time the time before	1	A. MGE is using the Grunsky bag method, has
2	this Case 95-320 was heard, was Laclede using the method	2	for 10, 12 years.
3	that was set forth in the statute to change to select	3	Q. Okay. Does the do you know of any
4	meters for change?	4	statute or regulation that requires a certain type of
5	A. Yes.	5	process for changing gas meters
6	Q. Okay. And in this case we're talking about	6	A. No.
7	here, 95-320, Laclede was requesting a variance that would	7	Q here in Missouri?
8	allow it to use a statistical meter sampling method to	8	So when the utilities want to use, for
9	select meters for replacement; is that correct?	9	example, the Grunsky method, do they need to come to the
10	A. Yes.	10	PSC to request approval?
11	Q. Until recently, I think really until	11	A. No.
12	earlier this year, is this still the method that Laclede	12	Q. Do they let's start with MGE. When they
13	had been using, do you know?	13	decided to start using the Grunsky method, did they come
14	A. They've been using it since '95, as far as	14	to the PSC and at least alert the PSC they were going to
15	I know.	15	start using this or start using it in conjunction with
16	Q. And still they're using this method?	16	other methods?
17	A. Yes.	17	MR. FRANSON: I'm going to think about an
18	Q. Okay. That's actually all I had on that,	18	objection. We have to be real careful talking about other
19	so let's move on. Are you familiar with a process for	19	utilities. Unless that information is public,
20	changing gas meters that's referred to as the Grunsky bag	20	Mr. Leonberger cannot answer that.
21	method or Grunsky method?	21	MS. MARTIN: Okay.
22	A. I'm familiar with it, yes.	22	MR. FRANSON: So as long as it's public, I
23	Q. And which terminology do you prefer for	23	will have no objections to him answering the question, but
24	that, Grunsky bag or just Grunsky method?	24	I remind everyone here that it must be public information
25	A. Doesn't make any difference.	25	about other utilities or otherwise he cannot answer.
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1	Page 18 O. Okay, I'm afraid I'll use it	,	
1 2	Q. Okay. I'm afraid I'll use it	1	BY MS. MARTIN:
2	Q. Okay. I'm afraid I'll use it interchangeably. If I say Grunsky method, I mean the	2	BY MS. MARTIN: Q. Would you know if that's public
2 3	Q. Okay. I'm afraid I'll use it interchangeably. If I say Grunsky method, I mean the Grunsky bag method, and vice versa.	2 3	BY MS. MARTIN: Q. Would you know if that's public information?
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2 3 4 5 6 7 8 9	<ul> <li>Q. Okay. I'm afraid I'll use it</li> <li>interchangeably. If I say Grunsky method, I mean the</li> <li>Grunsky bag method, and vice versa.</li> <li>Other than Laclede, are there gas utilities</li> <li>in Missouri that you know of that are using the Grunsky</li> <li>bag method?</li> <li>A. Yes.</li> <li>Q. Is this process a process for can you</li> <li>describe to me how the Grunsky method works, if you know?</li> <li>I mean, what's done just</li> <li>A. It's a method to change the meter without</li> <li>having to turn the flow of-gas off. Do you want</li> <li>specifically how the step through</li> <li>Q. No, you don't need to describe it that</li> <li>much. Prior to the implementation or the use of the</li> <li>Grunsky method, would the gas have to be turned off when a</li> <li>utility changed a gas meter?</li> <li>A. There are other methods besides a Grunsky</li> <li>method that can be used, but prior to the use of the</li> <li>Grunsky method, the utilities I'm aware of were using the traditional change-out.</li> <li>Q. So here in Missouri, you don't know of</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>Q. Would you know if that's public information?</li> <li>A. It wouldn't be public information because it wasn't part of a case.</li> <li>Q. Okay. So let me ask it then in regard to</li> <li>Laclede, let me ask you this: When did you first find out that Laclede was going to be using the Grunsky method?</li> <li>A. I'm not real sure.</li> <li>Q. Okay. Did you have any did the PSC do any investigation or did they have any discussion let me ask it that way prior to the time the Union filed its complaint about Laclede's use of the Grunsky method?</li> <li>A. We had discussions, yes.</li> <li>Q. So you knew they were going to be using the Grunsky method before the Union filed its complaint?</li> <li>A. Yes.</li> <li>Q. Was any sort of investigation done of</li> <li>Laclede's decision to start using the Grunsky bag in some situations?</li> <li>A. I was aware of the pilot programs they had done.</li> </ul>

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	Page 21		Page 23
1	if that's where I'm going.	1	and had not had a problem.
2	At the time Laclede let you know they were	2	MR. FRANSON: Can we stop and go off the
3	going to start doing it, did the Commission perform any	3	record?
4	sort of studies or investigations on its own about whether	4	(AN OFF-THE-RECORD DISCUSSION WAS HELD.)
5	or not the Grunsky method was a safe and effective method	5	BY MS. MARTIN:
6	of changing meters?	6	Q. I think we were just at you guys knew
7	A. A formal investigation?	7	that for the past ten years MGE had been doing it without
8	Q. Yes.	8	a problem. I think that was our last answer. Do you know
9	A. No.	9	whether or not MGE and Laclede performed the Grunsky
10	Q. Was there an informal investigation?	10	method in the same fashion?
11	A. Like I said before, we were aware of the	11	MR. FRANSON: I think we're going down the
12	pilot programs they were doing, what they had done with	12	same problem because you're asking other you're asking
13	those pilot programs.	13	information about other companies that I I'm I guess
14	Q. So you would say it's more a matter of	14	I need to hear Mr. Leonberger say his knowledge of that
15	Laclede letting you know what was going on, keeping you	15	subject would be public information. Otherwise, I'm going
16	abreast of it?	16	to have a problem with him answering the specifics about
17	A. Right.	17	what he knows about MGE.
18	Q. And let me just ask you this, too, because	18	BY MS. MARTIN:
19	you use the word formal investigation, and I think I know	19	Q. All right.
20	what you mean, but is there a are there any, like,	20	<ol> <li>My answer is going to be that, from my</li> </ol>
21	written provisions in the regulations or something that	21	knowledge, they both use the process procedure spelled
22	make a distinction between a formal investigation or	22	out in Grunsky's
23	informal investigation?	23	Q. Literature?
24	A. By formal or informal, I mean, we had	24	A. Literature, yes.
25	discussions with them about what they were going to do.	25	Q. Okay. So the way I understand it, when the
		<u> </u>	
	Page 22		Page 24
1	Page 22 We did not have a formal written-out memo-type	1	Page 24 Grunsky method is used and these meters are changed
1 2	-	1 2	
	We did not have a formal written-out memo-type		Grunsky method is used and these meters are changed
2	We did not have a formal written-out memo-type investigation, no.	2	Grunsky method is used and these meters are changed without turning off the gas, the utility does not need to
2 3	We did not have a formal written-out memo-type investigation, no. Q. So there wouldn't be any written records or	2 3	Grunsky method is used and these meters are changed without turning off the gas, the utility does not need to do a gas safety inspection on the customer side; is that
2 3 4	We did not have a formal written-out memo-type Investigation, no. Q. So there wouldn't be any written records or memos that the PSC Staff had put together about the	2 3 4	Grunsky method is used and these meters are changed without turning off the gas, the utility does not need to do a gas safety inspection on the customer side; is that correct?
2 3 4 5	We did not have a formal written-out memo-type investigation, no. Q. So there wouldn't be any written records or memos that the PSC Staff had put together about the Grunsky method?	2 3 4 5	Grunsky method is used and these meters are changed without turning off the gas, the utility does not need to do a gas safety inspection on the customer side; is that correct? A. The gas is not turned off, so it would not
2 3 4 5 6	We did not have a formal written-out memo-type investigation, no. Q. So there wouldn't be any written records or memos that the PSC Staff had put together about the Grunsky method? A. Correct.	2 3 4 5 6	Grunsky method is used and these meters are changed without turning off the gas, the utility does not need to do a gas safety inspection on the customer side; is that correct? A. The gas is not turned off, so it would not be required to be physically turned back on; therefore, an
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1	Page 25	1	Page 27 PSC's responses to the Union's Data Request in Case 0313,
2	A. If the gas is not physically turned on, it	2	which is the Grunsky bag case?
3	would not be inspection would not be required.	3	A. Yes.
4	O. All right. Do you know if there's	4	Q. Okay. And are you the individual that
5	anything, any other sort of inspection on the customer	5	provided the information in the responses?
6	side that replaces that that's performed by the utilities?	6	A. Yes.
7	A. Replaces?	7	Q. And that's your signature at the bottom of
l .	•	8	
8	Q. The gas safety inspection that would be	9	page 2?
9	done at turn-on, if there's fewer turn-ons when this		A. Yes.
10	Grunsky method is being used. Are there other	10	Q. The response to Data Request 1 indicates
11	inspections, I guess is what I'm asking you, on the	11	that in January of 2006 the Staff inquired to Laclede
12	customer side other than at turn-on?	12	about information that Laclede had about the Grunsky
13	A. Laclede does the home sale inspection.	13	method. What precipitated that inquiry?
14	That's not a regulated part of what we do	14	A. General information, just what they were –
15	Q. Right.	15	what exactly they were doing.
16	A but Laclede does that home sale	16	Q. Well, was January '06 close to the time
17	inspection.	17	when you had first learned that they would be implementing
18	Q. Yeah. And I think what I was just trying	18	the Grunsky method?
19	to get is an answer to that. I mean, do the regulations	19	A. I think we I knew about it before then.
20	require any other sort of inspection on the customer side	20	Q. And had any discussion been held before
21	other than at turn-on? And I think	21	then with Laclede and Staff?
22	A. No.	22	A. I don't know when, but I believe we we
23	Q you've answered that no.	23	talked about they were going to do a pilot program, but I
24	Okay. And that's the only customer-side	24	really had nothing formal, no.
25	gas safety inspection that the regulations discuss; is	25	Q. Are the documents that are attached to the
25 1 2	Page 26 that correct? A. State regulations, yes. The federal	125	Q. Are the documents that are attached to the Page 28 DRs, which I'll read your description of them, it's a brochure, an equipment catalog slash product list and a
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•	Page 29		Page 31
1	A. I just didn't find anything.	1	about the same time that I talked with Ben. So if Ben
2	Q. Okay. Did you find any information	2	says he wasn't there, he may not have been there. I may
3	discussing whether or not there were that stated there	3	have confused him with another conversation we may have
4	were no problems with the method?	4	had.
5	A. Just the information about it was being	5	Q. Okay. What were you told about the pilot
6	used and successfully.	6	program for the Grunsky bag by Laclede personnel?
7	Q. So it was just general information that you	7	A. That they were doing a pilot in the Mo Nat
8	found?	8	area and had done a pilot in the Laclede area before they
9	A. Right.	9	started implementation.
10	Q. In DR in Data Request 2 in your	10	Q. What is first area you said?
11	response, you have the word studies in a parenthetical. I	11	A. Missouri Natural.
12	want to make sure that doesn't mean does that mean that	12	Q. And were you given the details of the
13	the Staff might have undertaken another sort of research	13	program?
14	that wouldn't be covered by the word studies?	14	A. My understanding, they had done
15	A. The word studies is used in the Data	15	approximately 100 meters in the Missouri Natural area
16	Request, and so I used that just studies, meaning that we	16	where they had actually used the Grunsky bag and gone
17	didn't have, as I said before, any formal we started a	17	inside to see if there were any problems with the pilot
18	formal investigation of the Grunsky bag and had, you know,	18	lights still being lit.
19	information written out about that, no.	19	Q. Were you told about the pilot program
20	Q. So it doesn't mean that there may be other	20	before the pilot program or after?
21	written documents	21	A. I think I was aware of it. We weren't
22	A. No.	22	really I wasn't tracking it for a specific event, but I
23	Q that Staff prepared that you wouldn't	23	think I was aware of it.
24	call a study?	24	Q. Okay. Were you told that what the
25	A. No.	25	results of the pilot program were?
	-, io,		results of the phot program were?
	,		
1	Page 30		Page 32
1	Q. Okay. In DR 3, you list conversations or	1	A. At this point, yes.
2	Q. Okay. In DR 3, you list conversations or the names of people with whom the Staff discussed the	2	<ul> <li>A. At this point, yes.</li> <li>Q. When they were if you know, when they</li> </ul>
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# 8 (Pages 29 to 32)

	Page 33		Page 3
1	Q. So it's possible somebody else might be	1	Q. So Grunsky wouldn't be discussed in that?
2	using it and you just don't know yet?	2	A. Correct.
3	A. Possibly.	3	Q. Are there any do you know if there are
4	Q. Missouri Gas Energy, you indicated, has	4	limitations on time of year that the Grunsky method can be
5	been using it for about ten years?	5	used successfully?
6	<ol> <li>Over ten years, I believe.</li> </ol>	6	A. I would assume that my understanding
7	Q. I'm going to ask you a question about this,	7	would be the size of the load could possibly be a problem,
8	and just let me know if I'm crossing over into public or	8	but that could be the load could be at a time of year
9	private	9	or it could be at a size of the facility. But I mean, if
10	MR. FRANSON: We'll let you know.	10	the meters change out fairly quickly, I'm not sure there's
11	BY MS. MARTIN:	11	a problem in most residential applications.
12	Q information.	12	Q. Does it make a difference whether or not
13	You state in here that MGE personnel	13	the Grunsky's being used in the summer as opposed to the
14	indicated that they had had success using the method and	14	winter?
15	had not identified any problems using the method. That's	15	A. On a residential application, the load
16	the last sentence of DR 3.	16	would be less possibly be less in the summertime, but
17	My question is, do you know, does that	17	the amount of time that the meter's out of service
18	did that mean to you that they had been using what do	18	doesn't wouldn't necessarily make it a problem.
19	you mean to say in that sentence, is what I'm trying to	19	Q. And when you're talking about the load, is
20	get at? Did you mean to say that they'd been using the	20	that the amount of gas that's being
21	method, they had not had problems with pilot lights going	21	A. Yes.
<b>Z</b> 2	out or other sorts of gas leak issues when they were using	22	Q given to a house or business?
23	this method?	23	Okay. I'm going to ask you a couple of
24	A. Yeah, basically the method was successful	24	questions about AMR now, and I don't believe that we have
25	and they were able to change the meter out without	25	our responses to our AMR discovery, so that should
	Page 34		Page 3
1	problems like the pilot lights going out, things like	1	MR. FRANSON: Before we go on, have you
2	that.	2	sent any discovery requests to Staff in the AMR case?
3	Q. They had not identified any problems using	3	MS. MARTIN: No.
4	the method. Does that mean that they that you were not	4	MR. FRANSON: That's all I wanted to be
5	aware that that there were never situations where pilot	5	sure.
6	lights were going out?	6	MS. MARTIN: We don't have responses, but
7	A. I basically asked them that question, if	7	it wasn't to you-all that we served it.
8	they know of any problems. The answer was no.	8	MR. FRANSON: I was going to say, if you
9	Q. In either the have you discussed or	9	had, I wasn't aware of it.
10	in the meetings that you go to for the NAPSR, regional or	10	MS. MARTIN: No, we haven't.
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11			MS. MARTIN: No, we haven't.
11 12	in the meetings that you go to for the NAPSR, regional or annual, has the Grunsky bag method been discussed? A. I don't recall.	11	MS. MARTIN: No, we haven't. BY MS. MARTIN: Q. When did you first when did the Staff
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	Page 37		Page 39
1	A. The actual transfer of taking the index	1	one area where Staff had made a recommendation in one of
2	off, putting a new index on, no. I guess there are rate	2	our audits that Laclede should consider using AMR, I think
3	implications that sometimes they come in and talk to us	3	it was a 1985 case.
4	about the rate implications that may not me	4	Q. And that's a case with a 1985 dash
5	particularly, but our rate staff of rate implications of a	5	<ol> <li>It's a management audit case.</li> </ol>
6	large project, but	6	Q. What's a management audit?
7	Q. So just to make sure I understand this, if	7	A. The PSC has a section that does management
8	Laclede just wanted to take the dial that was on their	8	audits and looks at the efficiency of the operations. In
9	meters and change it to this AMR dial, this device to do	9	this case they looked at using AMR as one of the aspects
10	the reading, that's not something they would need approval	10	of that particular audit.
11	for, but there may be other implications of that they	11	Q. So when a management audit is done and a
12	would need approval for?	12	gas utility or another utility, but we're talking about
13	A. Correct. Specifically their tariff, they	13	gas utilities, so
14	were changing the way that AMR was going to be used to do	14	A. Right. Not only gas utilities, I think,
15	certain things, and the tariff required them to do certain	15	but in this case, that's the one they did on Laclede.
16	things, so the tariff was changed.	16	Q. Other than that, did the PSC Staff prepare
17	Q. Okay. And so I think one of the things	17	any written documents discussing the benefits or costs of
18	we're all familiar with from one of the other issues that	18	AMR?
19	arose was the variance case where they needed to have a	19	A. No, my staff didn't.
20	they wanted a change in how the meters were replaced or	20	Q. Do you know whether or not there was a test
21	selected for replacement as a result of AMR?	21	program with Laclede for the AMR implementation?
22	A. Right.	22	A. I think they had a pilot program, but I
23	Q. But that was a separate matter?	23	don't know when it exactly was.
24	A. Ríght.	24	Q. There are other gas utilities in Missouri
25	Q. Okay. Did you have any discussions with	25	that have AMR on their gas meters; is that correct?
		1	
4	Page 38		Page 40
1	anybody from Laclede about their implementation of $\widetilde{\mathrm{AMR}}$ or	1	A. Yes.
2	anybody from Laclede about their implementation of AMR or their plan to implement AMR?	2	<ul><li>A. Yes.</li><li>Q. Do you know which ones they are?</li></ul>
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10 (Pages 37 to 40)

1	Page 41		Page 43
1	like that; is that correct?	1	in the public domain and looks like in the regulations
2	A. Well, if there's a gas leak, that should be	2	that you've got?
3	reported to Laclede that there was a gas leak and they	3	A. Right. I mean, there's
4	would respond to that leak. Now, reported, do you mean	4	Q. It's one of the forms?
5	reported to the PSC?	5	A. It's a form it's a federal form that's
6	Q. Yes.	6	required to be turned in to the Federal Department of
7	A. Like I said, that criteria, it wouldn't	7	Transportation annually.
8	necessarily be reported to the PSC.	8	Q. Okay. And now, you also say that
9	Q. And that's what I was trying I mean, my	9	occasionally you get, I guess, calls from the public
10	question was just, you would hear about the results of it	10	reporting problems directly to the PSC; is that correct?
11	only if it fell within those, the loss of life, damage to	11	A. Correct.
12	property that we talked about earlier; is that correct?	12	Q. Now, do you-all have a hotline for that?
13	A. Well, I become aware of some that there has	13	<ol> <li>We have a consumer services line.</li> </ol>
14	been allegations that there has been some leaks on some,	14	Q. And the public takes advantage of this, I
15	but we've looked into those addresses and those meters,	15	gather?
16	yes.	16	A. We have they have all sorts of
17	Q. How would you hear about those?	17	complaints from all sorts of different utilities.
18	A. Through complaints.	18	Q. When you receive a complaint from a gas
19	Q. From the public you mean?	19	utility customer we'll hear speak specifically about
20	A. Yes.	20	AMR since that's the subject of the complaint. Say
21	Q. Let me just before I ask you about that,	21	somebody called in, said somebody came over and stuck this
22	when you get the other report, we had talked about annual	22	AMR device on my meter, now I have this nasty gas odor and
23	report, and on there the annual amount of gas leaks is	23	I called the people and complained. Does the PSC do
24	reported. It doesn't break it down by where it was?	24	anything about that?
25	A. No.	25	<ol> <li>I'm not sure how I got this, but we've</li> </ol>
L			
	Page 42		Page 44
1	Q. So it just would say 100 gas leaks were	1	Page 44 looked at a couple of addresses where there's a
2	Q. So it just would say 100 gas leaks were found this year?	2	looked at a couple of addresses where there's a . supposedly a severe leak caused and we checked with
2 3	<ul> <li>Q. So it just would say 100 gas leaks were</li> <li>found this year?</li> <li>A. Corrosion leak, a leak due to material .</li> </ul>	2	looked at a couple of addresses where there's a supposedly a severe leak caused and we checked with Laclede about what they they wanted to test that meter.
2 3 4	<ul> <li>Q. So it just would say 100 gas leaks were</li> <li>found this year?</li> <li>A. Corrosion leak, a leak due to material .</li> <li>defect, leak due to outside force damage, those kind of</li> </ul>	2 3 4	looked at a couple of addresses where there's a supposedly a severe leak caused and we checked with Laclede about what they they wanted to test that meter. Q. And is a formal investigation done at that
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>Q. So it just would say 100 gas leaks were</li> <li>found this year? <ul> <li>A. Corrosion leak, a leak due to material</li> <li>defect, leak due to outside force damage, those kind of categories.</li> <li>Q. So there are categories. It's just you</li> </ul> </li> <li>wouldn't say we had a leak at the meter? <ul> <li>A. Right.</li> <li>Q. That would maybe fall within the equipment,</li> <li>the second one you mentioned?</li> <li>A. It would depend on what the particular leak</li> </ul> </li> <li>was. <ul> <li>Q. So what are the categories on that annual report for gas leak, if you know?</li> <li>MR. FRANSON: Mr. Leonberger, if you're</li> <li>going to cite a specific regulation, please do that when you answer.</li> <li>THE WITNESS: There's a specific form from the it's actually the Pipeline Hazard Materials Safety</li> <li>Administration of the Department of Transportation, the cause of the leaks. There are corrosion, natural forces, excavation, other outside force damage, material or wells,</li> </ul></li></ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>looked at a couple of addresses where there's a supposedly a severe leak caused and we checked with Laclede about what they they wanted to test that meter.</li> <li>Q. And is a formal investigation done at that time?</li> <li>A. We just ask them if they tested that meter and what the specifically was the problem with that meter.</li> <li>Q. You're talking about you asked Laclede?</li> <li>A. Yes.</li> <li>Q. Okay. So the consumer would call the PSC and then the PSC calls Laclede?</li> <li>A. I don't know if it's a consumer or if it's someone else.</li> <li>Q. Someone else?</li> <li>A. Could be an employee or something. I'm not sure.</li> <li>MR. ZUCKER: Excuse me a minute. This is Rick Zucker. We're talking hypothetically now, or are we talking about an actual complaint?</li> <li>MS. MARTIN: Well, I was actually asking about a hypothetical, just generally what the PSC-would do in that situation, and I think he's just mentioned a</li> </ul>

11 (Pages 41 to 44)

Page 45 Page 47 addresses? 1 Α. Yes 1 2 2 MS. MARTIN: He just mentioned that he Q. And can you tell me in each case what the 3 looked at a couple of addresses. 3 results were? 4 MR. FRANSON: Rick, he has not said it's 4 One of them they couldn't find a leak. One Α. 5 123 Laclede Building in St. Louis, Missouri or something 5 of them they tested the meter to five pounds before it -like that. No, he has not named a specific address yet. 6 they found a very small leak. It's five -- you can 6 7 MS. MARTIN: Does that answer your 7 normally operate at about a quarter pound, and they had to 8 question? 8 test it to five pounds before they found a small leak. 9 MR. ZUCKER: Sort of. Go ahead. q Q. So at normal operating pressure, there 10 BY MS. MARTIN: 10 wasn't a leak? 11 Q. Okay. So in any event, somebody called. 11 Α. Right. 12 We don't know if it's a consumer or an employee. They 12 And those are the only calls that you're Q. tell you there's a problem, and you-all will call Laclede 13 aware of from the public about AMR installation? 13 14 to ask Laclede to give you information about it; is that 14 Yes. Well, I mean, we've had some other Α. correct? calls, people who said that they didn't want the -- they 15 15 16 16 didn't want Celnet to - no. There's been other calls. Α. Yes. 17 Q. And that would be the general process when 17 0. Well, let's stick --- I'm asking you about a customer calls in with a leak or an employee or 18 18 safety of the AMR installation, not people not wanting it, 19 whoever's calling it in, that's the normal process you-all 19 so --20 would follow? 20 No, not wanting -- they wanted Laclede to Α. 21 21 install them. Α. It depends on what the allegation is. 22 Q. Okay. So for other sorts of allegations 22 0. Right. In terms of calls about problems you would perhaps follow a different path? 23 caused by it being placed in there, you've not received 23 calls other than the two you just talked about? 24 Α. Perhaps we would -- in the course if we're 24 going to do an inves-- we do our annual inspections of 25 Specifically we've heard allegations from 25 Α. Page 48 Page 46 Laclede at different times. We would maybe incorporate the -- I believe in the letters from the representatives 1 1 looking at that in the course of our normal looking at 2 2 of the ex parte comments that there were leakage caused. records. So we wouldn't just ask them what it is, we may 3 We called and contacted Laclede once we saw those to say, 3 4 try to find it ourselves, or we may actually do a special 4 in general, have you -- do you have any that you know of, 5 inspection, go up there and say, we want to see the leak 5 these severe leaks they're talking about? And there was records for an area. So it depends on what the allegation 6 no -- they have no knowledge of those severe leaks, 6 7 is. 7 allegations there are leaks. 8 Q. Okay. Now, going more specifically to AMR, 8 Q. Is AMR -- has AMR been addressed in any of 9 have you had occasion to call Laclede about complaints 9 the meetings that you've gone to, either regional or 10 you've received on the consumer hotline about AMR 10 annual of the NAPSR? installation? 11 11 Α. Not that I'm aware of. We discuss the fact 12 I think it was the consumer hotline, but I 12 that a lot of people are going to AMR, going to using the Α. 13 can't remember what it was about, but we had a couple of 13 method. addresses we wanted to check on. Any discussions about how effective it's 14 14 0. 15 When you say couple, do you mean three? 15 been at the NAPSR meetings? Q. 16 Α. Two. 16 A. Effective how? 17 Two. And in those specific cases, what was Well, in terms of streamlining the billing Q. 17 0. 18 the process that you followed? 18 process. 19 Α. We asked them to -- if they were aware that 19 Α. Just the method of ---20 the meter was leaking, and they weren't aware that -- one 20 Saving money, time? Q. 21 of them they went out and found the meter and tested it. 21 Not having -- the AMR process of not having Α. 22 And when you say they, you mean Laclede? to go read individual meters and that kind of thing. Q. 22 23 23 Any discussion of safety problems connected Α. Yes. Q. 24 Q. And then Laclede called you back with the 24 with AMR installation at the NAPSR meetings? 25 results of the test? 25 Α. No. There would be no regulatory

12 (Pages 45 to 48)

#### MIDWEST LITIGATION SERVICES Phone: 1.800.280.DEPO(3376)

1			
1	Page 49 requirements addressing change out of meters, so it's not	1	Page 51 A. No. We were aware of, again, that this had
2	really a safety issue, as far as safety regulations		been done in other utilities and what had happened there,
2	requiring change out of meters.	3	so we weren't concerned that another utility was going to
4	Q. So has there been any I guess I want to	4	install AMR using a similar method, no.
5	make sure, has there been any anecdotal discussions with	5	Q. Had you received reports from other
_	these other folks that you were at these NASR meetings	6	
6	with about experiences they've had with AMR installation		utilities that they were experiencing any problems with AMR?
7 8	in their states related to safety?	8	A. What kind of problems?
9	A. I haven't heard any problems, no.	9	Q. Well, I guess I was going to have you tell
		E	
10	Q. Just briefly going back to the pilot	10	me when you received reports and then ask you what sort of problems.
11	program, AMR program, do you know how extensive that was,	11 12	•
12	Laclede's pilot program on AMR?		A. The only problems that I was aware of that was installation of the AMRs were installed to the
13	A. No.	13	
14	Q. Do you know if it was?	14	index was installed too tightly and they were not
15	A. I probably did at one time, but I don't	15	functioning correctly. It wasn't any safety problems. It
16	remember.	16	was more of a they had to go back out and reinstall the
17	Q. Okay. So you might have	17	index.
18	MR. ZUCKER: I'm sorry. Are you talking	18	Q. And
19	about the pilot program with AMR or the pilot program with	19	A. That wasn't Laclede. That was with another
20	the Grunsky method?	20	utility.
21	MS. MARTIN: AMR.	21	Q. Is the index the thing that gives you the
22	MR. ZUCKER: Did we establish a pilot	22	reading?
23	program with AMR?	23	A. The index is the plastic little box that
24	MS. MARTIN: He testified there was a	24	sits on the outside of the meter that has the dials.
25	THE WITNESS: I testified that I believe	25	Q. Okay. But you weren't receiving reports
			· · · · · · · · · · · · · · · · · · ·
1	Page 50 there was some kind of pilot program. That was many years ago, so I	1	Page 52 from other utilities that there were leaks associated with
1 2	there was some kind of pilot program. That was many years ago, so I	1 2	Page 52 from other utilities that there were leaks associated with the actual installation or other problems associated with
1 2 3	there was some kind of pilot program. That was many years ago, so I MR. FRANSON: The answer to your question,	1 2 3	Page 52 from other utilities that there were leaks associated with the actual installation or other problems associated with the actual installation of the device?
1 2 3 4	there was some kind of pilot program. That was many years ago, so I MR. FRANSON: The answer to your question, Rick, is yes, we did establish that.	1 2 3 4	Page 52 from other utilities that there were leaks associated with the actual installation or other problems associated with the actual installation of the device? A. I received no reports like that.
1 2 3 4 5	there was some kind of pilot program. That was many years ago, so I MR. FRANSON: The answer to your question, Rick, is yes, we did establish that. MR. ZUCKER: All right. Thank you.	1 2 3 4 5	Page 52 from other utilities that there were leaks associated with the actual installation or other problems associated with the actual installation of the device? A. I received no reports like that. Q. No safety complaints; is that correct?
1 2 3 4 5 6	there was some kind of pilot program. That was many years ago, so I MR. FRANSON: The answer to your question, Rick, is yes, we did establish that. MR. ZUCKER: All right. Thank you. BY MS. MARTIN:	1 2 3 4 5 6	Page 52 from other utilities that there were leaks associated with the actual installation or other problems associated with the actual installation of the device? A. I received no reports like that. Q. No safety complaints; is that correct? A. Correct.
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13 (Pages 49 to 52)

	Page 53		Page 55
1	A. Yeah.	1	training that those individuals would have to have.
2	Q. Does the PSC does Laclede provide	2	Q. Okay.
3	reports or other sorts of written documents to the PSC	3	A. So the rule requires that the company make
4	relating to complaints it might be receiving from its	4	a plan and a program, and then that program becomes what
5	customers in regard to AMR installation?	5	they have to train people on. So the rule requires to
6	A. Not that I'm aware of.	6	make the plan, then the plan is a training method.
7	Q. So if a customer complains to Laclede, oh,	7	Q. Okay. And does the PSC review the plan
8	I hate this, it's not working right, come out here and fix	8	that the company
9	it, you're not going to get here at the PSC any sort of	9	A. Yes.
10	report of that?	10	Q develops?
11	A. Not unless we have a case going that's	11	Can the company change the plan without PSC
12	asking those specific questions.	12	approval?
13	Q. Okay. In the absence of that sort of	13	A. They have any change to the plan have to
14	thing, that kind of a complaint's not passed on to the PSC	14	be given to us in a specified amount of time.
15	by Laclede?	15	Q. And then the PSC reviews those changes?
16	A. Not to me, no.	16	A. Right.
17	Q. Okay. Does the PSC impose any training or	17	Q. Does the PSC or has the PSC been monitoring
18	qualification requirements on the individuals who install	18	the field installation of the AMR devices by Laclede?
19	and service residential gas meters?	19	A. Have we been, like, going out in the field
20	A. Say that again.	20	and looking at them?
21	Q. Does the PSC impose any training or	21	Q. Yes.
22	qualification requirements on individuals who install and	22	A. No.
23	service residential gas meters?	23	Q. Do you receive any reports from Laclede
24	A. Yes, there's operator qualification	24	updating the PSC as to the status of the implementation of
25	requirements.	25	AMR?
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	Page 54		Page 56
1	Page 54 Q. Are those contained in the regulations?	1	Page 56 A. Over the course of time, we've had some
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2	<ul><li>Q. Are those contained in the regulations?</li><li>A. Yes.</li></ul>	2	A. Over the course of time, we've had some reports of how far along they are, but I don't look at
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14 (Pages 53 to 56)

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	Page 57	ł.	Page 59
11	some good part of the installation of AMR's been completed	1	not have to do a gas safety inspection at the time a new
2	have any safety concerns about the AMR installation?	2	customer gets their service; is that correct?
3	A. Do we have any concerns, specific concerns	3	A. According to our regulations.
4	at this point?	4	Q. According to your regulations. I just
5	Q. At this point.	5	wanted to ask you one more question about Union Exhibit 1,
6	A. No.	6	which was the Report and Order in Case No. 95-320. You've
7	MR. FRANSON: Okay. I should have made	7	got it in front of you. On page 6 of the Order, and the
8	this clear a long time ago. There is a distinction	8	numbers are at the bottom left, pages 1 of 8, 2 of 8, 6 of
9	between the PSC and the PSC Staff. And when you say does	9	8. I'm at page 6 of 8. Actually, I think what I want is
10	the PSC have some concerns as an example, that would	10	the very bottom. Do you recall that in this Order the
11	suggest maybe that the PSC has held some kind of hearings	11	Commission suggested a, what they were calling a
12	and made a determination. I think every question like	12	recapturing the safety inspections that were lost by the
13	that's going to be no. However, Mr. Leonberger represents	13	change in method of meter replacement?
14	the PSC Staff, and so when he's been saying the PSC, he's	14	<ol> <li>I'm aware of that, yes.</li> </ol>
15	really meaning the PSC Staff; is that correct?	15	Q. Do you know whether or not Laclede has ever
16	THE WITNESS: Yes. Sorry. I apologize.	16	implemented a program to recapture those lost
17	MS. MARTIN: No. Because I think some of	17	opportunities as the Commission calls it on page 6?
18	the questions will sometimes say PSC or PSC Staff, and	18	<ol> <li>At the time, right about this time in</li> </ol>
19	then sometimes I've gotten sloppy and just said PSC. I	19	1997?
20	always mean PSC Staff.	20	Q. I'm not sure when it was.
21	MR. FRANSON: I should have made that	21	MR. FRANSON: What is the date on the
22	clear.	22	Order?
23	THE WITNESS: And many times, like I said	23	THE WITNESS: Issue date of May 13 of 1997.
24	before, as far as the AMR, AMR is basically a	24	The Staff had was talking to there was concern about
25	metering-type function, not necessarily a safety function,	25	the leaking of the copper service lines and replacement of
<b> </b>	· · · · · · · · · · · · · · · · · · ·		
	Page 58		Page 60
1	so there may be other areas of the Staff, like the	1	the copper service lines. I think at the time Laclede was
1 2	engineering analysis section that may be doing things that		
2	engineering analysis section that may be doing anings that	2	replacing less than a thousand of those. So we had had a
3	I'm not necessarily aware of. I'm not saying I'm speaking	2 3	replacing less than a thousand of those. So we had had a very big safety concern about leaking copper service lines
1			
3	I'm not necessarily aware of. I'm not saying I'm speaking	3	very big safety concern about leaking copper service lines
3 4	I'm not necessarily aware of. I'm not saying I'm speaking for the whole Staff in most cases that aren't involving	3 4	very big safety concern about leaking copper service lines because of some incidents we'd had.
3 4 5	I'm not necessarily aware of. I'm not saying I'm speaking for the whole Staff in most cases that aren't involving safety. BY MS. MARTIN: Q. Now, is it your understanding that once an	3 4 5	very big safety concern about leaking copper service lines because of some incidents we'd had. So at that time, there was a specific
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>I'm not necessarily aware of. I'm not saying I'm speaking for the whole Staff in most cases that aren't involving safety.</li> <li>BY MS. MARTIN: <ul> <li><b>Q.</b> Now, is it your understanding that once an</li> </ul> </li> <li>AMR device is on a gas meter, that Laclede no longer has to visit the customer home to obtain a meter reading? <ul> <li>A. Yes.</li> <li><b>Q.</b> That's the premise of AMR, correct?</li> <li>A. Right.</li> </ul> </li> <li>Q. So Laclede no longer has to turn off gas service when a transfer of service is made; is that correct?</li> <li>A. If they're doing a transfer they would not have to go there to read the meter, no.</li> <li>Q. Because they could get their reading for the final bill and start when the new customer comes in, they can get the remote read?</li> <li>A. There would be no requirement from the safety regulations for them to go physically to the site, no.</li> </ul>	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>very big safety concern about leaking copper service lines because of some incidents we'd had.</li> <li>So at that time, there was a specific</li> <li>program that was implemented to do inspections, but we had the Laclede was ramping we were having them or discussing with them doing more replacements of copper service lines and doing more leak surveys over copper service lines because that was a very big safety concern. So at that point a lot of their resources</li> <li>were going to that particular issue, going from replacing less than a thousand to replacing thousands, about the '97, '98, '99 time frame.</li> <li>BY MS. MARTIN:</li> <li>Q. All right. So the Order we're talking about, the Commission's talking about again on page 6, that as a result of the change in the way meters are going to be selected for replacement, there's going to be an average of 20,000 fewer meter visits. Do you see where I'm looking at? It's the second full paragraph, second-to-last paragraph.</li> <li>A. Yes.</li> </ul>

15 (Pages 57 to 60)

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	Page 61	ŀ	Page 63
1	The Commission suggested that the	1	because of incidents we'd had. So at that point there was
2	appropriate response would be to implement a program to	2	a lot more activity that Laciede was going from replacing,
3	recapture those lost opportunities, do you recall that? I	3	like I said, less than 1,000 service lines to more and
4	think we just talked about that.	4	more and more, up to where in 2000 they started replacing
5	A. There's discussion about recapturing those	5	8,000 service lines a year.
6	opportunities elsewhere in Laclede's safety inspection	6	So they had a there's a safety
7	program.	7	initiative that took a lot of man hours, a lot of work
8	Q. Right. And so is your testimony that you	8	both doing the annual surveys over those and doing
9	believe that moving the safety, the lost opportunity to	9	replacement. So I don't know if it specifically
10	the corrosion inspection and inspection you just talked	10	recaptured lost opportunities for inside work, but we
11	about would satisfy this? Is that	11	believe because of the leaks in the number of leaks and
12	MR. FRANSON: Objection, that calls for a	12	the incidents we've had, that that particular effort was
13	legal conclusion. No. 1, you're assuming that the	13	very important.
14	Commission ordered Laclede to do something.	14	Q. I guess the question I'm asking is kind of
15	MS. MARTIN: No. I don't mean to be	15	simpler. Was that corrosion upping the corrosion
16	suggesting I think it was an Order. I think I said	16	inspection process and replacement process, was that in
17	suggestion.	17	response to this suggestion?
18	MR. FRANSON: And, okay, moving on, then.	18	A. No.
19	Next part of the objection is, what would satisfy this	19	Q. It was separate from that?
20	would be if there was some problem with the with	20	A. Yes.
21	Laclede not complying with a Commission Order. That would	21	Q. Do you know whether or not Laclede has set
22	be an entirely different proceeding. And I can tell you	22	up any other sort of inside inspection program on its own
23	that since this isn't part of the order paragraph, there	23	voluntarily to recapture the lost opportunity to inspect
24	would be a big question at best whether this was an actual	24	20,000?
25	order of the Commission for Laclede to do something.	25	A. Not that I'm aware of.
	Dara 62		Bugo 64
1	Page 62 So I guess my main objection is to the way	1	Page 64 MS. MARTIN: Okay. That was the only
2	your question is phrased about would it satisfy this. So	2	question I have, and I am finished.
3	I'm asking you can probably get around my objection by	3	MR. FRANSON: I think I'm going to be last,
4	just rephrasing the question.	4	if I've got any questions for Mr. Leonberger.
5	MS. MARTIN: Yeah, let me do that.	5	MR. POSTON: May I ask a clarifying
6	BY MS. MARTIN:	6	question? Bob's saying, no, I can't.
7	Q. At the bottom of page 6 of the Commission's	7	CROSS-EXAMINATION BY MR. POSTON:
8	Order, the Commission I certainly don't mean to be	8	Q. You had when you were talking about the
	suggesting that the Commission's ordering anything, but	0	Grunsky bags earlier, there had been questions about load
10	they're suggesting that Laclede's the appropriate	10	
10	response by Laclede to this variance it's granting in the	10 11	differences? A. Right.
11	way it's left in this replacement, would be to recapture	11	-
12		12	Q. I just want to clarify. Were you saying
13	the lost opportunities to observe and remedy potentially		that a greater load could cause the Grunsky method to be
14	unsafe conditions in other aspects of its safety	14	unsafe?
15	inspection program. Is that what you understood?	15	A. No, I didn't say that at all. I said that
16	A. This said lost opportunity. It said	16	there may be some appli I'm just not aware of the
17	recapture lost opportunities elsewhere in the safety	17	specific, you know, where you at what time, what how
18			big of BTU furnace or BTU appliance could be operating,
1	inspection programs.	18	here also and the second s
19	Q. Right. So what I'm asking what I was	19	but there's if you took a long time to do that method,
20	Q. Right. So what I'm asking what I was asking then was if you knew whether or not Laclede had	19 20	I assume there could be some - depends on the amount of
20 21	Q. Right. So what I'm asking what I was asking then was if you knew whether or not Laclede had implemented a program to recapture the lost opportunities	19 20 21	I assume there could be some depends on the amount of gas and pressure in the tank. I'm not aware of the
20 21 22	Q. Right. So what I'm asking what I was asking then was if you knew whether or not Laclede had implemented a program to recapture the lost opportunities that are discussed in this Order, and you then answered	19 20 21 22	I assume there could be some depends on the amount of gas and pressure in the tank. I'm not aware of the specific specifications on that, no.
20 21 22 23	Q. Right. So what I'm asking what I was asking then was if you knew whether or not Laclede had implemented a program to recapture the lost opportunities that are discussed in this Order, and you then answered A. What I said was that right about that same	19 20 21 22 23	I assume there could be some depends on the amount of gas and pressure in the tank. I'm not aware of the specific specifications on that, no. MR. POSTON: That's all.
20 21 22 23 24	<ul> <li>Q. Right. So what I'm asking what I was asking then was if you knew whether or not Laclede had implemented a program to recapture the lost opportunities that are discussed in this Order, and you then answered A. What I said was that right about that same time period, the corrosion of copper service lines and</li> </ul>	19 20 21 22 23 24	I assume there could be some depends on the amount of gas and pressure in the tank. I'm not aware of the specific specifications on that, no. MR. POSTON: That's all. THE WITNESS: I'm just saying in general,
20 21 22 23	Q. Right. So what I'm asking what I was asking then was if you knew whether or not Laclede had implemented a program to recapture the lost opportunities that are discussed in this Order, and you then answered A. What I said was that right about that same	19 20 21 22 23 24	I assume there could be some depends on the amount of gas and pressure in the tank. I'm not aware of the specific specifications on that, no. MR. POSTON: That's all.

16 (Pages 61 to 64)

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<b></b>		1	
	Page 65	1	Page 67
	things.		Q. Yes, sir.
2	MS. MARTIN: I just want to follow up to	2	A. No.
3	that.		Q. And if you were concerned about the safety
4	REDIRECT EXAMINATION BY MS. MARTIN:	5	of AMR installation, what would you do? A. As I stated before, when we find something
5	Q. That sort of thing might be addressed in	6	<ul> <li>As I stated before, when we find something that the Staff believes is an unsafe method or unsafe</li> </ul>
6	the literature you get?	-	
1	A. Right.	7	material, we would take measures to talk to the company
8	Q. From the Grunsky company, correct?	8	about stopping to use that. If we believed the method or
9	A. And I was just more familiar with how it	9	material was bad and they weren't voluntarily stopping to
10	worked, not specifically all of the where the cutoffs	10	use it, then we would talk to the Commission about having
11	were on certain when you should use them and not.	11	an order to stop.
12	MR. FRANSON: Rick, I think I'm last.	12	MR. ZUCKER: Thank you. That's all I have.
13	MR. ZUCKER: Okay. Let me just ask a few.	13	MR. FRANSON: A couple clarifying
14	And I'm sorry if I repeat something that was already	14	questions, Mr. Leonberger.
15	asked.	15	CROSS-EXAMINATION BY MR. FRANSON:
16	CROSS-EXAMINATION BY MR. ZUCKER:	16	Q. Let's talk about pipes in an average
17	Q. Mr. Leonberger, was it your testimony that	17	household. Let's use a hypothetical residential customer
18	based on MGE's long-time use of the Grunsky method, that	18	of Laclede. It's a normal three-bedroom, two-bath home,
19	you did not have concerns about Laclede using it?	19	we'll say 1,500 square feet, and it is set up, piped for
20	<ol> <li>I was aware that the Grunsky method had</li> </ol>	20	natural gas. What facilities would ordinarily be used to
21	been around for 50 or so years and then MGE was using it,	21	provide service by Laclede to this customer, and where
22	and I was aware that during our inspections that they were	22	does Laclede ownership and responsibility for those
23	saying they had not had any problems with it. So when	23	facilities begin and end, and where would the customer
24	another utility started to use the same type of method, it	24	ownership and responsibility begin and end?
25	didn't raise concerns, no.	25	<ol> <li>In a typical residential service, there</li> </ol>
<u> </u>	Page 66		Page 68
1	Q. And if you had reason to believe that the	1	would be a service line come up to the house. On the high
2	Grunsky meter change method was unsafe, what would you do?	2	pressure, there would be a regulator to reduce the
3	A. If we had knowledge of something, a	3	pressure to about a guarter of a pound, and there would be
4	particular method or particular material that wasn't	4	a meter, and the regulatory responsibility or Laclede's
5	that we believed wasn't working correctly or wasn't good,	5	property ends at the outlet of that meter.
6	we would probably ask the company not to use that, and if	6	On a low pressure, which would be the
7	we felt strongly that it was a bad method, we would	7	pressure in the main would be essentially the same
8	probably go to the Commission and have them order them not	8	pressure that the appliances would operate at, there would
9	to use it.	9	be a service line to the house. There would not be a
10	Q. With regard to AMR, do you have any idea of	10	regulator because the pressure in the main would be the
11	about how many AMR units Laclede has installed to date?	11	same pressure the appliances operated at. There would be
12	A. To date, no. I don't know. I mean, I know	12	a meter and meter set piping going on, and the same thing,
13	it's over I believe it's over 200,000, but that	13	the Laclede property ends at the outlet of the meter.
14	number's quite a few months ago. I really don't know the	14	Q. And that meter in most instances is outside
15	exact number to date, no.	15	the house?
16	Q. Okay.	16	A. I think Laclede's Mr. Zucker could
17	A. I'm not getting I'm not getting a week	17	say correct me if I'm wrong but I believe
18	by week or, you know, day by day update on the number	18	Q. Hold on. Let's not leave it to Mr. Zucker.
19	that's being installed, no.	19	A. I believe there's about a 60/40 split
20	Q. And. Have you received since Laclede	20	between there's about 60 percent of their meters are
21	began installing AMR devices on meters last year, have you	20	outside and 40 percent are inside, is my recollection.
22	received any reports of incidents related to the	22	Q. Okay. What you just talked about would
23	installation of an AMR meter?	22	cover the outside meters; is that correct?
23 24	A. Incident like leaking gas causing a formal	23	A. What's that?
25	incident?	25	Q. About where the responsibility ends,
A			

# 17 (Pages 65 to 68)

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	Page 69		Page 7
1	Laclede's responsibility ends at that meter?	1	turn-on.
2	A. Inside or outside, the responsibility of	2	A. My understanding is that our rule requires
3	Laclede would end at the outlet to the meter	3	the inspection at turn-on, that the federal rule doesn't
4	Q. At the outlet to the meter?	4	require that, and my understanding most from what I've
5	A. Yes.	5	talked to my peers in other states, that they don't have a
6	Q. Or at the meter itself?	6	requirement even at turn-on to go inside and inspect the
7	A. The outlet of the meter.	7	inside stuff.
8	Q. Which is connected to the meter itself?	8	Q. So weren't the answer wasn't limited to
9	<ol> <li>Right. There's an inlet and outlet to the</li> </ol>	9	Missouri utilities?
10	meter, where the gas comes in the meter and out of the	10	A. Well, no. I asked that question because
11	meter.	11	the idea that other utilities, other states that I know of
12	Q. Tell me where more time, where does	12	don't have even the requirement to go inside when the gas
13	Laclede's	13	is turned on, so I was just trying to figure out what he
14	A. The outlet of the meter.	14	was asking, if he was asking empirically in Missouri or
15	Q. So once the gas goes out of the meter and	15	nationwide.
16	on into the house, that's the customer's responsibility?	16	MR. FRANSON: Well, let's go back. I'll
17	A. Right, past the outlet of the meter.	17	ask that question.
18	Q. Okay. Do you know of any regulations that	18	RECROSS-EXAMINATION BY MR. FRANSON:
19	require, other than when the interruption when gas flow	19	Q. Generically in Missouri, unless the flow of
20	is interrupted to a house, that requires Laclede to go in	20	gas is interrupted, does is there any requirement that
21	and do an inspection of the inside premises?	21	you know of in Missouri that the gas utility go inside an
22	A. Specifically Laclede in Missouri or any	22	perform an inspection inside the customer's home?
23	other	23	A. If the utility if the gas is physically
24	Q. Let's talk specifically about Laclede.	24	turned on, they have to go in and do an inspection of the
	A. Unless the flow of gas is turned on, Page 70	25	inside piping and appliances. On an inside meter set, Page 7
		25 1 2	
25	Page 70 there's not a requirement for them to go in and do an	1	Page 7 there is there is Laclede's service line piping that
25 1 2	Page 70 there's not a requirement for them to go in and do an inside check.	1 2	Page 7 there is there is Laclede's service line piping that goes up to the meter set, there are requirements of
25 1 2 3	Page 70 there's not a requirement for them to go in and do an inside check. Q. Any other LDCs that you are aware of?	1 2 3	Page 7 there is there is Laclede's service line piping that goes up to the meter set, there are requirements of corrosion control and leakage surveys that Laclede would
25 1 2 3 4	Page 70 there's not a requirement for them to go in and do an inside check. Q. Any other LDCs that you are aware of? A. No other LDCs that I know do a check on the	1 2 3 4	Page 7 there is there is Laclede's service line piping that goes up to the meter set, there are requirements of corrosion control and leakage surveys that Laclede would be required to go inside not only with go inside and do
25 1 2 3 4 5	Page 70 there's not a requirement for them to go in and do an inside check. Q. Any other LDCs that you are aware of? A. No other LDCs that I know do a check on the inside piping unless they physically turn the gas on	1 2 3 4 5	Page 7 there is there is Laclede's service line piping that goes up to the meter set, there are requirements of corrosion control and leakage surveys that Laclede would be required to go inside not only with go inside and do a leak and inspection and do a corrosion inspection on the
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# 18 (Pages 69 to 72)

	Page 73		Page 75	5
1	MR. ZUCKER: No more for me.	1	SIGNATURE PAGE	
2	THE REPORTER: Read and sign?	2	STATE OF MISSOURI )	
3	MR. FRANSON: Yes. We will waive	3	) ss. COUNTY OF COLE )	
4	presentment, but not signature, yes.	4		
5	THE REPORTER: Rick, this is the court	5	I, Robert Leonberger, do hereby certify:	
6	reporter. Did you want a copy?	6	That I have read the foregoing deposition;	
7	MR. ZUCKER: Please. Do you do e-tran?	7	That I have made such changes in form and/or	
8	THE REPORTER: Yes.	8	substance to the deposition as might be necessary to	
9	MR. ZUCKER: That will be fine.	9	render the same true and correct;	
10	THE REPORTER: Robert, did you want a copy?	10	That having made such changes thereon, I hereby	
			subscribe my name to the deposition.	
11	MR. FRANSON: Yes, I do, but I want the	12	I declare under penalty of perjury that the	
12	mini.	13 14	foregoing is true and correct. Executed the day of, 2006, at	
13	THE REPORTER: Mark, did you want a copy?	15		10.01
14	MR. POSTON: Please.	16	,	1.00
15	(PRESENTMENT WAIVED; SIGNATURE REQUESTED.)	17		1
16			ROBERT LEONBERGER	
17		18		
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1	CERTIFICATE OF REPORTER	1 2 V	Page 76 ERRATA SHEET Witness: Robert Leonberger	100 000 000 000 000 000 000 000 000 000
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2 3	CERTIFICATE OF REPORTER STATE OF MISSOURI )	2 V 1 3 4 t	ERRATA SHEET Witness: Robert Leonberger In Re: USW Local 12-6 v. Laclede Gas Company Upon reading the deposition and before subscribing thereto, the deponent indicated the following changes	
2 3 4	CERTIFICATE OF REPORTER STATE OF MISSOURI ) ) ss. COUNTY OF COLE )	2 V 1 3 4 t	ERRATA SHEET Witness: Robert Leonberger In Re: USW Local 11-6 v. Laclede Gas Company Upon reading the deposition and before subscribing	
2 3 4 5	CERTIFICATE OF REPORTER STATE OF MISSOURI ) ) ss. COUNTY OF COLE ) I, KELLENE K. FEDDERSEN, RPR, CSR, CCR, and	2 V 3 4 t 5 5	ERRATA SHEET Witness: Robert Leonberger In Re: USW Local 11-6 v. Laclede Gas Company Upon reading the deposition and before subscribing thereto, the deponent indicated the following changes should be made: Page Line Should read:	
2 3 4 5 6	CERTIFICATE OF REPORTER STATE OF MISSOURI ) ) ss. COUNTY OF COLE ) I, KELLENE K. FEDDERSEN, RPR, CSR, CCR, and Notary Public within and for the State of Missouri, do	2 V 3 L 4 t 5 F 6 F	ERRATA SHEET Witness: Robert Leonberger In Re: USW Local 11-6 v. Laclede Gas Company Upon reading the deposition and before subscribing thereto, the deponent indicated the following changes should be made:	
2 3 4 5 6 7	CERTIFICATE OF REPORTER STATE OF MISSOURI ) ) ss. COUNTY OF COLE ) I, KELLENE K. FEDDERSEN, RPR, CSR, CCR, and Notary Public within and for the State of Missouri, do hereby certify that the witness whose testimony appears in	2 N 3 L 4 tt 5 F 6 F 7 F	ERRATA SHEET Witness: Robert Leonberger In Re: USW Local 11-6 v. Laclede Gas Company Upon reading the deposition and before subscribing thereto, the deponent indicated the following changes should be made: Page Line Should read: Reason assigned for change:	
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19 (Pages 73 to 76)

MIDWEST LITIGATION SERVICES Phone: 1.800.280.DEPO(3376)

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1	Midwest Litigation Services	102011	
Ľ,	3432 West Truman Boulevard, Suite 207		
2	Jefferson City, MO 65109 Phone (573)636-7551 * Fax (573)636-9055		
4	July 24, 2006		
5	Robert Franson Missouri Public Service Commission		
6	P.O. Box 360		
	200 Madison Street		
7	Jefferson City, MO 65102 In Re: USW Local 11-6 v. Laclede		
9	Dear Mr. Franson:		
10	Please find enclosed your copy of the deposition of Robert		
	Leonberger taken on July 6, 2006, in the above-referenced case. Also enclosed is the original signature page and		н. -
1	errata sheet.		
12			
13	Please have the witness read your copy of the transcript, indicate any changes and/or corrections desired on the		
	errata sheet and sign the signature page before a notary		
14			
15	Please return the errata sheet and notarized signature page to Ms. Martin for filing prior to trial date.		
16			
17	Thank you for your attention to this matter.		
17	Sincerely,		
18			
19	Kellene K. Feddersen, RPR, CSR, CCR		
20			
<b>_</b> ~.	Enclosure		
21	cc: Janine Martin Rick Zucker		
22	Marc Poston		
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