

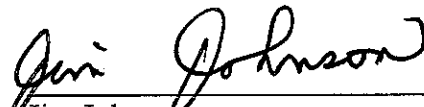
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

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

AFFIDAVIT OF JIM JOHNSON

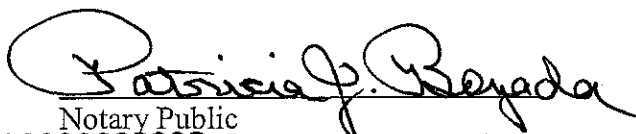
STATE OF MISSOURI)
) ss
COUNTY OF ST. LOUIS)

Jim Johnson, of lawful age, on his oath states: that he has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 4 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by him; that he has knowledge of the matters set forth in such answers; and that such matters are true to the best of his knowledge and belief.

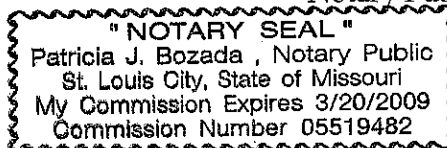


Jim Johnson

Subscribed and sworn to before me this 4th day of January, 2007.



Notary Public



My commission expires _____

NP

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

1 **Q. Who is your current employer?**

2 A. I have been employed by Laclede Gas in the service department for 27 years.

3 **Q. Have you been involved with any recent gas leaks involving an AMR device?**

4 A. On November 10, 2006, I was called out to ** because of
5 a gas odor in the boiler room. I arrived at the address, a business known as
6 **, which employs developmentally disabled children.

7 The business requires people to sign in before they are allowed inside, so after
8 signing in, I met with **, the maintenance supervisor. He had
9 called Laclede after smelling gas, and he led me to the boiler room, the location of
10 the leak.

11 **Q. What did you find in the boiler room?**

12 A. There was an industrial-sized meter in the boiler room, about ten feet away from
13 the boiler for the entire building. I immediately smelled gas upon entering. I ran
14 my gas detector over the meter and I received a 25% reading near the AMR
15 device. This means that 25% of the air surrounding the top of the meter was gas.
16 Any gas leak so close to the boiler is particularly dangerous.

1 **Q. What did you do next?**

2 A. As a service employee, I am not trained or qualified to work on industrial meters.
3 Therefore, I called the meter shop to arrange that the meter be repaired. Unlike
4 service employees, meter shop employees are qualified to work on industrial
5 meters. However, that day was Veteran's Day, a holiday for the meter shop, so
6 no one answered. I then called the dispatcher, who connected me to
7 Superintendent Elgin Manalang, who was taking calls for the meter shop that day.
8 Superintendent Manalang suggested shutting the gas off until the meter shop
9 employees could come out after the weekend. However, the maintenance
10 supervisor said that the owner of ** ** would not be happy about having
11 no power over the weekend. Superintendent Manalang then said he was around
12 40 minutes away, and told me to wait until he arrived.

13 The boiler room had two large doors which lead outside, and I opened these up to
14 ventilate the area. I then stood outside the doors and chatted with the
15 maintenance supervisor. I never touched the meter until Superintendent
16 Manalang arrived.

17 **Q. How did the leak occur?**

18 A. The maintenance supervisor said that the day before he called the leak in, an
19 AMR device had been installed on the meter. He said he did not watch the
20 installation because he was busy at the time. However, after the installation, he
21 smelled gas in the boiler room and called Laclede. Prior to the installation, he did
22 not smell gas at the meter.

23 **Q. What did you do after Superintendent Manalang arrived?**

1 A. After Superintendent Manalang arrived, I showed him the 25% reading on the
2 AMR device. He then told me to take the AMR device off and he would give me
3 instructions on how to work on the industrial meter. This procedure was required
4 because Superintendent Manalang, a supervisor, is not supposed to perform any
5 labor on gas meters.

6 I took the AMR device off, and once it was off I could hear gas blowing. Upon
7 inspecting it, I discovered that one of the two screws used to install the AMR
8 device had penetrated the meter casing, thus causing the leak.

9 At first, I thought the gas reading on the AMR device was coming from the
10 wiggler, where AMR devices typically leak from. However, this leak was coming
11 from under the screw itself.

12 **Q. How did you repair the leak?**

13 A. At Superintendent Manalang's direction, I performed a temporary repair by
14 pushing Permagum in the hole, putting pipe compound on the screw, and then
15 putting the screw back in.

16 **Q. Did this fix the leak?**

17 A. No. I still smelled gas even after plugging the hole caused by the screw that
18 attached the AMR device. With the AMR device already off, I then unscrewed
19 the two screws that hold the dial face over the wiggler. These are smaller, fatter
20 screws, less than 1" in length. I noticed that one of the meter dial screws had also
21 penetrated the meter. I performed the same repair on this screw as I did on the
22 one that held the AMR device on.

1 **Q. Do you know whether the screws that penetrated the meter were installed by**
2 **hand or with a power tool?**

3 A. I do not know. Laclede service employees are only equipped with hand
4 screwdrivers. In my 27 years of working at Laclede, I have installed and removed
5 numerous screws on gas meters. In this time, I have never penetrated a meter
6 with a screw using a hand screwdriver.

7 **Q. Has Laclede management in any way suggested that you had caused the**
8 **meter to leak?**

9 A. No. I have never been disciplined in my 27 years of working at Laclede. The
10 maintenance supervisor was present the entire time I was at the address. Also,
11 Superintendent Manalang was also with me while I performed work on the meter.
12 Superintendent Manalang said that the installer had to have known that the meter
13 was leaking. He also said that he would look at the sign-in book upstairs for the
14 installer's name. Moreover, I have not been questioned about this job by either
15 my immediate supervisor or the superintendent of SAID.

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

17 A. Yes.