

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

USW Local 11-6)	
)	
)	
v.)	Case No. GC-2006-0060
)	
Laclede Gas Company,)	
Respondent.)	

**ISSUES LIST, ORDER OF WITNESSES, ORDER OF CROSS, AND
ORDER OF OPENING STATEMENTS**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and submits the above-referenced items pursuant to the Commission's Order Setting Procedural Schedule dated April 25, 2006:

1. In 2005, Laclede began implementing a program to install automated meter reading (AMR) units on virtually all of the meters in its service territory. Through cellular technology, AMR units would send meter reads directly to Laclede's offices. This technology allows Laclede to receive reads on a daily basis if necessary, eliminating the need to visit the customer's property to obtain either a regular monthly meter reading, or a final read when gas service is transferred between customers without interrupting the flow of gas.¹ As a result, Laclede sought and received approval of tariff changes that effectively eliminated its need to visit the customer's premises and charge the customer a service initiation fee of \$36.00 in circumstances where service was transferred without the flow of gas being interrupted. Such tariff changes also eliminated the obligation to seek yearly manual meter readings of certain inside meters in those instances where an AMR device had been installed and could provide such readings.

¹ This transfer is referred to by Laclede as a "TFTO."

2. In August 2005, Local 11-6 filed a Complaint, alleging that the elimination of the TFTO inspections that had been performed in conjunction with TFTO transfers, as well as the obligation to obtain yearly manual meter readings of certain inside meters, adversely impacted public safety. Local 11-6 amended its Complaint on February 10, 2006, adding as its request for relief that Laclede be required to perform TFTO inspections and obtain annual manual reads of inside meters.

3. The parties have raised the following issues that the resolution of this case requires the Commission to decide:

- A. Does any gas safety law, rule, order, or decision of the Commission require Laclede to perform TFTO inspections and annual inside meter reads?
- B. If not, is there nevertheless a sufficient safety justification for considering a requirement to perform TFTO inspections and annual inside meter reads with its attendant costs?
- C. If there is such a safety justification, who can or should be responsible for performing TFTO inspections and annual inside meter reads and under what circumstances?
- D. If gas utilities can and should be held responsible for performing TFTO inspections and annual inside meter reads, should this be established through a complaint procedure or through a rulemaking?

4. The order of witnesses will be:

- a. Local 11-6: Stephen Hendricks, Kevin Stewart, Joe Schulte,
Robert Peterson;
 - b. Staff: Robert Leonberger
 - c. Laclede: Thomas Reitz
5. The order of cross-examination will be:
- d. Local 11-6 witnesses: Office of Public Counsel (OPC), Staff,
Laclede;
 - e. Staff witness: Laclede, OPC, Local 11-6;
 - f. Laclede witnesses: Staff, OPC, Local 11-6;
6. The order of opening statements will be: Local 11-6, Staff, Laclede; OPC.

Respectfully submitted,

/s/ Thomas R. Schwarz, Jr.

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all counsel of record this 9th day of May 2006.

/s/ Thomas R. Schwarz, Jr.