SUBPOENA DUCES TECUM

Missouri Public Service Commission

JUL 0 6 2006

FILED⁴



THE STATE OF MISSOURI. 1	Co Honeywell Corp	oration (*)	<u>/</u>
	· · · · · · · · · · · · · · · · · · ·	matter pending	
You are hereby commanded to be	e and appear personally befo	re The Public Service Con	mission of the State of
Missouri พหมหมังอาหารเราสาราส			, <u>2006</u> at
T	730 Carondelet Ave., S	Suite 200	
_one o'clock of that day, at	t. Louis, MO 63105	in the County of	St. Louis
in the State of Missouri, to testify	deposition at a kazzy in the matter of	USW 11-6 v. Lac	Lede Gas Company,
PSC No. GC-2006-0390			
And that you bring with you and p	deposition	SEE ATTACHMENT	A
rind maryou oring maryou and		· · · · · · · · · · · · · · · · · · ·	
on behalf of USW 11-6	, and hereof fa	il not at your peril. The pe	rson or officer serving
	·		
this writ is commanded to have th	e same at the time and place	aforesaid, certifying there	on its return.
	м.,		
Given under my hand, this <u>6th</u>	day of, 20		
(1) that	Secreta	(y	·
Name Colleen M. Dale	[Title]	Secretary	· ·
		-	
	1		· ,
•	RETUR	N	
HEREBY CERTIFY that I have		ding the same in the prose	noo and bearing of the
· · ·	. 1		
within named	on theda	y of,,	, in
·	County, in the State of	f Missouri.	
· · ·			
Name]	, [Title]		
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ATTACHMENTS TO SUBPOENA DUCES TECUM

Honeywell Corporation

- (*) Representative produced at deposition needs to be able to testify knowledgeably about the following subjects:
- 1. Honeywell's hiring practices with regard to personnel to install and supervise installation of automatic meter reading ("AMR") devices on residential gas meters served by Laclede Gas Company;
- 2. Honeywell's training of the above-referenced installers and supervisors;
- 3. Any requirements or other input about hiring or training received from Laclede Gas Company or Cellnet Technology, Inc.
- 4. Problems identified by installers, customers or Laclede Gas Company about the abovereferenced installation or training.

Attachment A

List of documents to be provided at deposition of Honeywell Corporation representative:

- 1. All job postings issued by or on behalf of Honeywell Corporation for supervisors or installers of AMR devices on gas meters;
- 2. Job applications and wage withholding forms for all persons hired by or on behalf of Honeywell Corporation for supervisors or installers of AMR devices on gas meters;
- 3. All correspondence and other documents to or from Manpower, Inc. and other temporary employment agencies concerning the hiring of supervisors or installers of AMR devices on gas meters, including but not limited to documents reflecting the names, addresses and qualifications of the applicants, and documents setting forth the terms and conditions of employment;
- 4. All training manuals and other training materials used in the instruction of supervisors or installers of AMR devices on gas meters;
- 5. All gas leak detectors, first-aid equipment, tools and other equipment provided to installers of AMR devices on gas meters;
- 6. All call logs and other records of leaks, unfinished installations and other problems identified with the installation of AMR devices on gas meters, regardless of whether the information was obtained from installers, customers, Laclede Gas Company, Cellnet Technology, Inc., Manpower, Inc. or another temporary employment agency.