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**USW Local 11-6's Response to Laclede Gas Company's  
Second Set of Data Requests  
Case No. GC-2006-0060**

1. Please identify each person whom the Union expects to call as an expert witness at trial and, for each, please provide a current curriculum vitae, including the expert's name, address, occupation, place of employment and qualifications to give an opinion, the general nature of the subject matter on which the expert is expected to testify and the expert's hourly deposition fee. Also, please identify any and all documents relating to any of the information sought in this data request, including any written or recorded materials provided by the Union to such expert witness or received by you from such expert witness.

**RESPONSE:** The Union does not at this time expect to call an expert witness at trial.

2. With respect to the Union's contention in paragraph 9 of its Amended Complaint that "... the above-referenced changes [in paragraphs 6 and 7 of the Amended Complaint] have or will adversely impact public safety," please:

**FILED<sup>2</sup>**

JUN 05 2006

Missouri Public  
Service Commission

Exhibit No. 15  
Case No(s) GC-2006-0060  
Date 5-22-06 Rptr KF



- a. Identify any and all documents known to the Union that relate to whether actual meter readings, or the absence thereof, adversely impact public safety;

**RESPONSE:** USW Local 11-6 does not know of any documents that relate to whether actual meter readings, or the absence thereof, adversely impact public safety.

- b. Identify any and all documents known to the Union that relate to whether TFTO Inspections, or the absence thereof, adversely impact public safety;

**RESPONSE:** In addition to the documents attached to its response to Laclede's First Set of Data Requests, which reflected notes or reports of hazards detected by Laclede employees who were performing TFTOs, USW Local 11-6 identifies the arbitration transcript of the grievance of Louis Jackson, held on March 24, 2006. The transcript accompanies these responses.

- c. Identify any and all documents known to the Union which show that the incidence of hazards discovered during actual meter readings on a Gas Company Customer's premises is different than the incidence of similar hazards existing on a Gas Company Customer's premises that were not the subject of an actual meter reading;

**RESPONSE:** The Union does not have any documents responsive to this data request.

d. Identify any and all documents known to Union which show that the incidence of hazards discovered during TFTO Inspections on Gas Company Customer's premises is different than the incidence of similar hazards existing on a Gas Company Customer's premises that were not inspected in connection with a TFTO;

**RESPONSE:** The Union does not have any documents responsive to this data request.

e. Identify any and all documents known to the Union which show that TFTO Inspections and/or actual meter readings are more effective in discovering hazards on customer's property than are the customers in discovering such hazards;

**RESPONSE:** See response to DR 2(b).

f. Identify any and all documents known to the Union which show that a change in a Gas Company Customer, without an interruption in the flow of gas to such customer's premises, causes a safety hazard greater than the hazard that

existed, if any, had there not been a change in Gas Company Customer at such premises; and,

**RESPONSE:** See response to DR 2(b).

g. Identify any and all documents known to the Union which show that Gas Company Customers with indoor gas meters are subject to a greater safety hazard than Gas Company Customers with outdoor gas meters.

**RESPONSE:** See response to DR 2(b).

3. For the five (5) year period preceding the date of the Union's response to this request, please:

a. State the number of instances known to the Union involving either damage or injury to a Gas Company Customer's property or body that was caused by or arose out of the deterioration of the customer's appliance or gas lines within the customer's premises; and,

**RESPONSE:** Any instances known to the Union of injury to any Gas Company Customer's property or body caused by the deterioration of the customer's appliance or gas lines within the customer's premises are anecdotal and in the public domain, more specifically, reported in the media.

b. State the number of instances known to the Union involving either damage or injury to a Gas Company Customer's property or body that could have been prevented if the Gas Company had been required to obtain an actual meter reading; and

**RESPONSE:** The Union objects to this data request because, until the recently granted variance, Laclede has been required to obtain an actual meter reading through an actual visit to the customer's home. Therefore, there should not be any instances in which damage or injury occurred due to the failure to obtain an actual meter read. Without waiving its objection, the Union states that it is unaware of any instances of damage or injury that occurred because Laclede failed to perform an actual meter read..

c. State the number of instances known to the Union involving either damage or injury to a Gas Company Customer's property or body that could have been prevented if the Gas Company had been required to conduct a TFTO Inspection; and

**RESPONSE:** The Union objects to this data request because, to its knowledge, Laclede has been required to perform a TFTO inspection at change of service. Therefore, there should not be any instances in which damage occurred due to the failure to conduct a TFTO inspection. Without waiving this objection, the Union

states that it is unaware of any instances of damage or injury that occurred because Laclede failed to perform a TFTO at change of service.

d. Identify any and all documents that the Union reviewed or relied on in responding to each subpart (a) through (c), inclusive.

**RESPONSE:** See attached compilation of articles printed by the St. Louis/Southern Illinois Labor Tribune.

4. Identify any and all documents known to the Union relating to Laclede's obligation to:

- a. Prevent its customers from installing, removing, repairing, maintaining or otherwise handling gas lines and gas appliances within the customer's premises;
- b. Inspect its customer's installation, removal, repair, maintenance or handling of gas lines or gas appliances within the customer's premises;
- c. Perform inspections of the customer's gas lines or appliances on the change of Laclede's customer at a property.

**RESPONSE:** Chapter 393 of the Revised Statutes of Missouri, and the regulations issued there under, set forth the obligation of Laclede to provide safe and adequate gas service. In addition, certain of Laclede's Tariffs, including but

necessarily limited to R-10-a, R-11, R-12, R-14 and R-15, address Laclede's obligations with respect to a-c above.

5. Identify all persons with knowledge of facts relating to the Union's contention that the changes described in paragraphs 6 and/or 7 of the Union's Amended Complaint "... have or will adversely impact public safety," and with respect to each such person, please:

- a. Provide a detailed summary of each person's knowledge of such facts;
- b. State how such person acquired such knowledge of such facts;
- c. State when such person acquired such knowledge of such facts;
- d. State where such person acquired such knowledge of such facts; and,
- e. Identify all documents relating to each such person's knowledge of such facts.

**RESPONSE:**

1. Joe Schulte, USW 11-6 Business Agent. Mr. Schulte has submitted affidavits in this matter that set forth in detail his knowledge of the facts relating to the Union's complaints.
2. Kevin Patterson, USW 11-6 Business Manager. Mr. Patterson has knowledge of the benefits of inspections at TFTO and during annual meter reads. His knowledge of these facts comes from his years of service as a Laclede employee.

3. Walter Reitz, Manager of Labor Relations for Laclede Gas. Mr. Reitz testified at the arbitration of Louis Jackson about the importance of performing gas safety tests at TFTO. The Union is not privy to how, when or where Mr. Reitz obtained his knowledge.
4. Joseph Williams, General Foreman, Central District, Laclede Gas. Mr. Williams testified at the arbitration of Louis Jackson about the importance of performing gas safety tests at TFTO. The Union is not privy to how, when or where Mr. Williams obtained his knowledge.
5. Mike Sisak, Foreman, North District, Laclede Gas. Mr. Sisak testified at the arbitration of Louis Jackson about the importance of performing gas safety tests at TFTO. The Union is not privy to how, when or where Mr. Sisak obtained his knowledge.

In further response to this DR, the Union states that it believes Laclede employees in the meter and service departments may have knowledge of the importance of safety inspections at TFTO and during annual meter reads and, therefore, the potential adverse impact should such inspections cease. The Union expects to name one or more Laclede employees as witnesses and will list such persons in accordance with the schedule issued in this matter.

6. Please produce for inspection by Laclede all documents identified in response to, or responsive to, each of the above data requests.



**RESPONSE:** Any documents referred to above have either already been provided in response to other DRs, are already within the control of Laclede, i.e., Missouri Revised Statute, Chapter 393 and Laclede's Tariffs, or are publicly available, such as media reports of damage caused by gas.

The information provided to Laclede Gas Company in response to the above data requests 1-6 is accurate and complete, and contains no material misrepresentations or omissions based upon present facts known to the undersigned.

Date: May 9, 2006

Signed By /s/ Janine M. Martin

Title: Attorney for Plaintiff