

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JAN 05 2007

Missouri Public
Service Commission

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

AFFIDAVIT OF LINDA TIERNEY

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

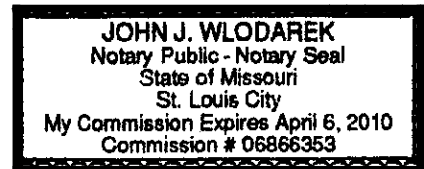
Linda Tierney, of lawful age, on her oath states: that she has participated in the preparation of the following Direct Testimony in question and answer form, consisting of 3 pages of Direct Testimony to be presented in the above case, that the answers in the following Direct Testimony were given by her; that she has knowledge of the matters set forth in such answers; and that such matters are true to the best of her knowledge and belief.


Linda Tierney

Subscribed and sworn to before me this 5 day of September, 2006.


Notary Public

My commission expires 4/6/2010



USW Exhibit No. 24-NP
Case No. GC-2006-0390
Date 12/12/06 Rptr MW

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

1 **Q. Please state your name and address.**

2 A. My name is Linda Tierney and my address is ~~**~~ ~~**~~MO
3 63123.

4 **Q. How did you first find out about the installation of AMR devices on gas**
5 **meters by Cellnet subcontractors?**

6 A. I first found out about the installation of AMR devices through articles in the
7 Labor Tribune.

8 **Q. When did Laclede notify you that an AMR device was to be installed in your**
9 **home?**

10 A. In early spring of 2006, I received a phone message from a company
11 subcontracting from Laclede stating that an AMR device was to be installed. I
12 returned the call that same day and requested that a union gasworker, not a
13 subcontractor, install the device. The person I spoke with said my request would
14 be noted and we scheduled a date for the AMR installation. While I do not
15 remember the exact scheduled date, it was a Friday afternoon. Because my meter
16 is inside my home, I took one half day off work to let the gasworker in.

1 Q. Why did you ask to have a Laclede gasworker, as opposed to a Cellnet
2 subcontractor, install the AMR device?

3 A. I understand and believe that union gasworkers have substantial training not
4 available to the Honeywell subcontractors that enable them to recognize and fix
5 potential problems when installing the AMR device. Accordingly, I believe it is
6 safer to have an AMR device installed on my gas meter by a union gasworker
7 rather than by a Honeywell subcontractor.

8 Q. Was the AMR device then installed as scheduled?

9 A. No. No one showed up the scheduled Friday afternoon, and I called Laclede the
10 following Monday. A representative informed me that a Cellnet employee had
11 already installed an AMR device the Saturday before. I told the representative
12 that I wanted a Laclede gasworker to install the AMR device, not a Cellnet
13 employee. He said that the meter was already installed, and there was nothing I
14 could do about it now. I then expressed my safety concerns about having a
15 Cellnet employee install the AMR device. He told me to call Laclede if I smelled
16 gas. I then ended the conversation.

17 Q. Did you inquire further about when the AMR device was actually installed?

18 A. I was not home the date of the installation. However, my son, **, ** was
19 present. I asked him what happened that day. He said that a man came to the
20 door and said he was with Laclede and was there to read the meter. He said it
21 should only take a few minutes. My son said that the man took over ten minutes
22 to complete his work, so my son asked him if anything was wrong with the meter.

1 The man replied that he needed to install something on the meter so it took
2 slightly longer than usual.

3 I was very upset about the whole experience. Not only did a Cellnet
4 subcontractor install the AMR device, but he also engaged in deceptive conduct to
5 gain entry to my home.

6 **Q. Are you an employee or member of USW Local 11-6, or to your knowledge**
7 **are you related by blood or marriage to any USW Local 11-6 officer or**
8 **business representative?**

9 A. No.

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

11 A. Yes.