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314.554.2237 314.554.4014 (fax) jcook@ameren.com

May 22, 2002

## FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65101

Re:

Sharon Greene

Case No. EC-2002-1035

Dear Mr. Roberts:

Enclosed for filing are an original and eight (8) copics of the Answer filed on behalf of Union Electric Company, d/b/a AmerenUE, in the above case.

Please return a file-stamped copy of the filing letter in the enclosed self-addressed stamped envelope. If you have any questions or wish to further discuss this matter, I can be reached at (314) 554-2237.

James J. Cook

Managing Associate General Counsel

JJC/ch Enclosures

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

Sharon Greene,		)	
	Complainant,	)	
VS.		)	
AmerenUE,		)	Case No. EC-2002-1035
		)	
	Respondent.	Ś	

## ANSWER OF UNION ELECTRIC COMPANY, d/b/a AMERENUE TO COMPLAINT

Comes now Union Electric Company, d/b/a AmerenUE, ("Respondent"), by counsel, and submits this pleading in response to the Complaint filed by Sharon Greene, in accordance with instructions outlined in the Notice of Complaint, dated April 25, 2002, from the Missouri Public Service Commission ("Commission"):

- 1. Ms. Greene filed a complaint with the Missouri Public Service Commission on April 19, 2002 disputing the budget billing adjustment balance on her account.
- 2. According to Respondent's tariffs filed with the Missouri Public Service Commissions, accounts under the Budget Billing Plan are billed in amounts equal to one-twelfth of the estimated annual cost of service to the customer. The Company adjusts the bills during the fourth and eighth month based on actual usage during such billing period and will also adjust the average billing under the Plan, if necessary.
- 3. In March, 2001, a \$986.00 deposit was refunded to Ms. Greene's account. During this time, Ms. Greene discontinued paying her budget billing amount, which at that time was \$217.00 a month.

4. After applying all of the credits to her account, Ms. Greene received a bill, in August of 2001 for \$173.45. The amount of usage for the bill period was actually \$402.88.

5. Ms. Green continued to pay less than the total amount shown on her monthly bills.

6. Customers may at any time elect to terminate the application of the Budget Billing Plan by requesting such termination and thereafter paying when due any amounts, including billing adjustment, which may be necessary in order to settle the account balance. When Ms. Greene chose to terminate her billing on March 19, 2002. Her account after billing adjustment had a deficit of \$960.60.

WHEREFORE, Union Electric Company, d/b/a AmerenUE requests this Complaint be dismissed, since the Respondent's action were consistent with the Commission approved tariffs and is entitled to the amount of \$960.60 owed by Ms. Greene.

Dated: May 22, 2002

Respectfully submitted,

Union Electric Company, d/b/a/ AmerenUE

Bv:

James J. Cook, MBE #22697

Ameren Services Company

One Ameren Plaza

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via U.S. first-class mail on this 22th day of May, 2002, on the following parties of record:

CASE NO. EC-2002-1035

Office of the Public Counsel P. O. Box 7800 Jefferson City, MO 65102 General Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Sharon Greene 2805 Annapolis St. Louis, Missouri 63114