

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

Jack Patrick's Bar & Grill,)	
Complainant)	
)	
vs.)	Case No. EC-2008-0362
)	
Union Electric Company,)	
d/b/a AmerenUE,)	
Respondent.)	

ANSWER

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE or Company), and for its Answer to the Complaint filed in this proceeding, states as follows:

1. On May 12, 2008, Jack Patrick's Bar & Grill of 1002 Olive, St. Louis, MO 63101 (Complainant) initiated this proceeding by filing a Complaint against AmerenUE.
2. Any allegation not specifically admitted by the Company should be considered to be denied.
3. In Paragraph No. 1 of the Complaint, Complainant alleges that AmerenUE is located in St. Louis, Missouri, and that AmerenUE is a public utility under the jurisdiction and supervision of the Public Service Commission of the State of Missouri. AmerenUE admits the allegations contained in Paragraph No. 1 of the Complaint.
4. In Paragraph No. 2 of the Complaint, Complainant states that they received a bill from AmerenUE in December of 2007 for \$26,320.70 with a letter saying due to "an internal system problem," they had not been billed on a specific meter and were being assessed sums for 24 months prior usage.

5. AmerenUE admits that the Complainant was sent a rebill statement for a 24 month period when it was found on November 2, 2007 that the main breaker controlling power being registered by the meter on their account was turned off and all service being used by Complainant was routed through another meter which the Company did not have linked to Complainant's address.

6. The Complainant also alleges that if a rebill is appropriate, it should only be for 6 months, as a non-registering meter. AmerenUE disagrees with this interpretation of its tariffs. There is no allegation that the meter was not registering. In fact, it was registering at all times. The problem was with the meter connections, as the power had been turned off so the meter reading was never transmitted to AmerenUE. Improper meter connections are subject to adjustment for the current period and for twenty-four prior billing periods. PSC MO Schedule No. 5, 1st Revised, Sheet 170, General Rules and Regulations, V. Billing Practices, Section 2(G)(d). This portion of the tariff is attached to the Complaint.

7. Complainant alleges it paid its electric bill each month, but omits the fact that the bills only reflected a customer charge and did not include charges for the electric power which was consumed on the premises. The Complainant does not deny that it consumed electricity at this location.

8. AmerenUE has tried, at all times, to rebill in as fair a manner as possible. The Company has voluntarily reduced the amount it is rebilling for the two year timeframe to \$**[REDACTED]**, basing the final rebill on the Complainant's actual electric consumption for November of 2007. This calculation presumes Complainant would have

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the same usage level in mid-summer as it did in November, an assumption that clearly favors the Complainant.

9. The Company understands that Complainant is faced with a rebill that is substantially larger than its normal bills and, consistent with Commission regulations, would allow Complainant to pay this rebill balance off over a period of two years.

WHEREFORE, AmerenUE respectfully requests that the Commission issue an order approving the adjusted amount of \$**[REDACTED]** or, in the alternative, set the matter for hearing.

Dated June 19, 2008

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer was served on the following parties via electronic mail (e-mail) or via regular mail on this 19th day of June, 2008.

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