

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

SUMMERFIELD INN d/b/a)	
America's Value Inn,)	
)	
Complainant,)	
)	
v.)	Case No. GC-2009-0236
)	
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 December 3, 2008, Summerfield Inn d/b/a America's Value Inn of 4224 S. Clark Street, in Mexico, Missouri (Complainant) initiated this proceeding by filing a Complaint against AmerenUE.

2. Any allegation not specifically admitted herein by the Company should be considered to be denied.

3. In Paragraph 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 1 of the Complaint.

4. In Paragraph 2, Complainant alleges that they called AmerenUE three times in 2008 to fix different problems. Complainant stated that AmerenUE checked the meter and solved the problems.

5. AmerenUE offers a few minor points of clarification. By way of background, Complainant has a combined electric, natural gas and dusk-to-dawn account with AmerenUE and some of the contacts in 2008 were about services other than natural gas.

6. On October 7, 2008, an AmerenUE employee was working on a meter adjacent to Complainant's meter and smelled natural gas. After determining there was a leak around the AMR module of Complainant's meter, AmerenUE changed the meter. Complainant was not billed for the gas meter change.

7. When the gas meter was changed, it was noted that the meter was being incorrectly billed at a constant of 1 instead of 1.656. Accordingly, on October 9, 2008, AmerenUE issued a corrected bill which went back 24 months using the 1.656 constant. Exhibit 1HC is a copy of that corrected bill. Unfortunately, it appears that AmerenUE failed to include a letter explaining the rebill. The Company's normal practice is to include such a letter, but AmerenUE does not find a record that it followed its normal practice.

8. On October 31, 2008, AmerenUE received a phone call from Complainant, inquiring about the rebill. Complainant was told that AmerenUE would look into the rebill and get back to him. On November 3, 2008, an AmerenUE representative called Complainant back to explain the rebill. A letter and a spreadsheet showing exactly how his usage was adjusted for each month were also sent that same day. Exhibit 2HC is a copy of the letter and spreadsheet.

9. On Page 1 of the attachment to the Complaint, Complainant goes through various times he had called AmerenUE, including a report of a gas leak on May 27, 2008.

The Company has a record of a call on May 19, 2008 in which it states that the customer says he can smell and hear gas coming from the pipe. AmerenUE visited the property and found the leak was on a portion pipe owned by Complainant. AmerenUE shut off the customer owned valve to the leaking portion of the line, although it was not necessary to discontinue service to the entire location.

9. On page 2 of the attachment to the Complaint, Complainant references a conversation with an AmerenUE employee regarding its dusk-to-dawn light three days after receiving the recent corrected gas bill. The Company cannot confirm or deny this conversation as it's most recent record regarding any dusk-to-dawn light repair on the Complainant's account was April 2, 2008.

10. On Page 3 of the attachment to the Complaint, Complainant references an electric outage in February or March 2008 in which an AmerenUE employee turned on his neighbor's electric service before turning on Complainant's service. AmerenUE's records show an outage on February 4, 2008, but the Company has no record of any conversations between Complainant and the AmerenUE employees out in the field. AmerenUE cannot confirm which location was turned on first or why.

11. AmerenUE believes that the rebill was correct and should be allowed. Regrettably, an error was made in AmerenUE's billing of this customer but the correction was made according its tariffs. AmerenUE made the billing adjustment for the 24 months per the gas tariff approved for AmerenUE under Rules and Regulations Section VII. Measurement of Service; G. Billing Adjustments; 2. Non-Residential; d. "Bills rendered which are based on incorrect registration due to improper meter connections, the application of an improper meter constant, ... shall be subject to adjustment for the

current and twenty-four (24) prior billing periods, as can be substantiated by Company records.”

WHEREFORE, AmerenUE respectfully requests that the Commission issue an order dismissing this Complaint or, in the alternative, set the matter for hearing.

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 6th day of January, 2009.

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/s/ Wendy K. Tatro

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**Exhibits 1HC and 2HC
contain Highly Confidential
information and have been removed
from this Public version.**