

Jimmie E. Small,)
Complainant,)
vs.)
Union Electric Company, d/b/a)
Ameren Missouri,)
Respondent.)

VS.

Exhibit A-2

- f. Whether the statements previously formed part or parcel of Respondent's discovery responses during the 2010 informal complaint and formal written complaint case NO; 2011-0247and;
- g. Whether the statements were written or recorded and'
- h. The substance of each statement.

RESPONSE NO. 2:

Ameren Missouri has not, and no one acting on its behalf have, obtained any statements from any person regarding any events or happenings that occurred in regard to incidents referred to in Complainant's Complaint.

INTERROGATORY NO. 3:

During the time period 04/17/2006, state whether Respondent named in charge/cause No: 2011-0247; Cause NO: 2012-0050, or any of its related entities have ever installed, placed, attached or assimilated a Red Tag Security Seal, at Lot # 23, Meter Serial Number 57623981; **Security Seal Identification Number 4677914**, Location 23067 Potter Trail, Lake Road Tr. Court Park, Kirksville, Missouri. 63501.

RESPONSE NO.3:

The electric utility meter located at service address 23 Lakeroad Ct., Kirksville, Missouri, 63501 from at least May 15, 2002 until at least 14, 2008 is identified by Ameren Missouri as meter number 57623981. Ameren Missouri installed a red colored seal on said meter when electric utility service to said address was disconnected on April 17, 2007, and then installed another red colored seal on said meter when electric utility service to said address was disconnected on April 14, 2008.

Ameren Missouri does not keep record of the numbers printed on the red colored seals that are placed on electric utility meters at the time of disconnection. The numbers on the seals are pre-printed by the manufacturer and have no significance to Ameren Missouri.

INTERROGATORY NO. 4:

State whether Respondent on or about April 17, 2006, caused to be completed a field order for disconnecting electric service, Lot # 23, 23067 Potter Trail, Kirksville, Missouri.

RESPONSE NO. 4:

Ameren Missouri did not cause a field order for disconnection of electric utility service to service address 23 Lakeroad Ct., Kirksville, Missouri 63501 to be completed on or about April 17, 2006. A field order for disconnection of electric utility service to said service address was completed by Ameren Missouri personnel on April 17, 2007.

INTERROGATORY NO. 5:

State whether Respondent Utility has ever disconnected electric service on or about April 2006 time period, Lot # 23, 23067 Potter Trail resulting in a Final Bill Disconnect circumstance and related notice to Consumer Collection Management, Maryland High Mo. agency concerning an uncollectable utility bill. 04-00-2006 time period, and continuing.

RESPONSE NO.5:

See answer to Interrogatory No. 4 regarding disconnection of service in 2007, not 2006. On or around July 27, 2007 Complainant's then delinquent account balance of \$495.78 for electric utility service to 23 Lakeroad Ct, Kirksville, Missouri 63501 was assigned by Ameren Missouri to Consumer Collection Management for collection.

INTERROGATORY NO. 6:

State whether the Red Tag Seal (admission) served with Respondents answer, Cause NO: 2012-0050; Cause No: 20110247, was ever assigned, equipped, installed with RED tag Serial Number 4677914, 04/17/2006 Cut-out, disconnect.

RESPONSE NO.6:

As stated in response to interrogatory No. 3, above, Ameren Missouri does not keep record of the numbers printed on the red colored seals that are placed on electric utility meters at the time of disconnection. The numbers on the seals are pre-printed by the manufacturer and have no significance to Ameren Missouri. However, in late April 2011, in response to Complainant's Subpoena Duces Tecum served on Ameren Missouri in Case No. EC-2011-0247, Ameren Missouri personnel went to service address 23 Lakeroad Ct., Kirksville, Missouri 63501 and took a photograph of the red seal then in place on the meter, and included a copy of the photograph in its response to said subpoena. Although difficult to make out, it appears from the photo that the number printed on the red colored seal is 4677914.

INTERROGATORY NO.7:

State the name(s) of each expert witness Respondent intends to call at a formal Commission hearing, [If need] cause No. 2012-0050.

RESPONSE NO. 7:

No retained expert witnesses have been identified at this time. Ameren Missouri will supplement this response in a timely manner if and when it identifies any retained expert witnesses. Ameren Missouri anticipates calling the following persons as non-retained expert witnesses if Case No. EC-2012-0050 proceeds to an evidentiary hearing:

Cathy Hart, Ameren Missouri Customer Services Supervisor, Michael Horn, Ameren Missouri Supervisor of Credit Collections, and Tommie Gray, Senior Revenue Protection Supervisor.

INTERROGATORY NO. 8:

State the names of each Respondent representative, agent, employee, consultant, legal counsel, Utility CEO, company president having knowledge of the purpose of Red Tag Security Seal, specifically Red Tag Serial Identification numbers; and for each Red Tag used, state:

- a. The total number of counties within Missouri service jurisdiction where Respondent has installed Red Tag Security device containing identifiable serial numbers 2002 forward, and for each county, state,
- b. The Respondent's purpose(s) in using Red Tag Serial Identification Numbers;
- c. State whether serial number affixed to Red Tag Security device[s], LOT # 23, 23067 Potter Trail, services and accommodations, involves a transaction in the ordinary course of Respondent's disconnect, Cut-Out procedure [s] throughout Missouri jurisdiction services and accommodations, area.
- d. State each known ratified Tariff covenant which Respondent officials contend is made applicable to Respondent disconnect, Cur-Out policies, practices, customs, usage, and or trade. 42 U.S.C.A. sect 1982; 1983; 1985(3) civil conspiracy against utility customers on Mo. jurisdiction watch[MPSC].

RESPONSE NO. 8:

As stated in response to Interrogatory No. 3, the numbers on the red seals are pre-printed by the manufacturer and have no significance to Ameren Missouri. Therefore,

Ameren Missouri is not aware of any Ameren Missouri representative, agent, employee, officer, et cetera, with knowledge of the purpose of the numbers printed on the red seals.

- a. Ameren Missouri serves 59 counties in Missouri. However, Ameren Missouri breaks its Missouri service territory into districts. In the district which includes the 23 Lakeroad Ct., Kirksville, Missouri 63501 service address, Ameren Missouri meter personnel place red seals on electric utility service meters when electric utility service is disconnected.**
- b. Ameren Missouri does not use the numbers pre-printed on the red seals for any purpose.**
- c. The number pre-printed on the red seal placed on the meter at service address 23 Lakeroad Ct., Kirksville, Missouri 63501 was not involved in or related in any way to the disconnection of electric utility service at said service address. Red seals, irrespective of any number that may be pre-printed on them, are placed on electric utility meters when service to the meters is disconnected.**
- d. Ameren Missouri Electric Service Tariff Sheets Nos. 180 through 184, General Rules and Regulations, Disconnection and Reconnection of Service, are applicable to Ameren Missouri's disconnection of service practices.**

INTERROGATORY NO.10:

Identify each and every document known by Respondent that in any way describes the Utility's intent and purpose for Red Tag Seal identification numbers, and for each *document* response, state;

- a. The present custodial of each document;**

- b. The time, date and jurisdiction{ Mo. county of service performed] made applicable to Red Tag Security Seal services and accommodations,
- c. State all Respondent Authority, Tariff Contract agreement, covenant which *bind* the Respondent Utility to said disconnect servicing procedures;
- d. State the identity of *each county* and state jurisdiction in which Respondent used Red Rag Security seal disconnect, [identification numbers] similar to the ID number attached to service meter presently located at LOT # 23, 23067 Potter Trail, Kirksville, Missouri. # 4677914.
- e. State the Automated Meter Reading, [AMR] KWH data, "Customer-Specific" information, LOT # 23, at the First Final Billing time period, April 17, 2006, LOT # 23, 23067 Potter Trail, Kirksville, Missouri, Cottonwood street facility, 2006 time period.

RESPONSE NO. 10:

As stated in response to Interrogatory No. 3, the numbers on the red seals are pre-printed by the manufacturer and have no significance to Ameren Missouri. Ameren Missouri has no intent or purpose for the numbers pre-printed on the seals, and does not keep record of the numbers printed on the red colored seals that are placed on electric utility meters at the time of disconnection. Therefore, there are no documents describing Ameren Missouri's intent and purpose for the numbers pre-printed on the red seals.

INTERROGATORY NO. 11:

State the number of informal complaints filed against UE,AM.MO. with the Missouri Public Service Commission, which relate directly or indirectly to claims of illegal or unlawful

disconnect[Trespass to real property claims] of residential electricity, state of Missouri
Jurisdiction. 42 U.S.C.A. 1982; 1983; 1985(3) civil conspiracy, federal jurisdiction.

RESPONSE NO. 11:

Ameren Missouri keeps records regarding informal complaints filed against it with the Missouri Public Service Commission for the preceding five years. Within the most recent five year period, Ameren Missouri is unaware of any informal complaints filed against it in which the complainants allege an illegal or unlawful disconnect involving a trespass by Ameren Missouri.

INTERROGATORY NO. 12:

Identify for the integrity of the Commission record, the number of formal complaints against Respondent Company year 2000 forward through 2011 time period which relate to alleged illegal or unlawful disconnect of residential services and accommodations.

RESPONSE NO. 12:

Ameren Missouri keeps records regarding formal complaints filed against it with the Missouri Public Service Commission for the preceding five years. Within the most recent five year period, Ameren Missouri is aware of two formal complaints filed against it wherein the complainant alleged an improper disconnection of residential electric utility service.

INTERROGATORY NO. 13:

Identify all opinion witnesses you may call at the time of Commission hearing, No. 2012-0050 and state for the record their written opinions.

RESPONSE NO 13:

See response to Interrogatory No. 7. Pursuant to R. 56.01(4)(a), Ameren Missouri states in response to this Interrogatory that the general nature of the subject matter on which the non-retained experts identified in the response to Interrogatory No. 7 is as follows:

- a. **Cathy Hart:** Ms. Hart is expected to give testimony regarding Ameren Missouri practices with regard to customer service, billing, disconnection and reconnection of utility service, and record-keeping.
- b. **Michael Horn:** Mr. Horn is expected to give testimony regarding Ameren Missouri practices with regard to billing and collections.
- c. **Tommie Gray:** Mr. Gray is expected to give testimony regarding Ameren Missouri meter-related activities.

INTERROGATORY NO. 15:

State whether any performance deficiencies by Respondent employees were identified after Complainant Small notified his Utility that a Bill Dispute, was in order, during the time period, April 17, 2006. For each employee performance deficiency, state,

- a. Identify by date the Utility employee performance deficiency[ies] was discovered;
- b. Describe how respondent identified each employee performance deficiency in connection with LOT # 23, 23067 Potter Trail services, electric services 2002 through April 17, 2006 time period;

- c. Identify each supervisor who registered the utility performance deficiency, 2002 time period through October 2011 and continuing, , Lot # 23, Location of services & accommodations;
- d. Identify for the Commission's formal record, the scope of seriousness an illegal disconnect of services at LOT # 23, 23067 Potter Trail, Kirksville, Mo. might have in context to Ratified Tariff covenants, not to discriminate or retaliate against residential customers, throughout Missouri jurisdiction.

RESPONSE:

Subject to and without waving its previously-stated objection to Interrogatory No. 15, Ameren Missouri states that no Ameren Missouri employee performance deficiencies have been identified related to Complainant's account or accounts, whether before or after Complainant filed this Complaint.

INTERROGATORY NO. 17:

Identify each respondent document which relates directly or indirectly to employee discipline measures, for the manner of services and accommodations provided customer/complainant, to and including the Final Bill Notice, and related Debt Collection action taken on behalf of Respondent Utility, April 2006 time period and continuing on 2011.

RESPONSE NO.17:

No Ameren Missouri has been disciplined for the manner of services and accommodations provided to Complainant.

INTERROGATORY NO. 18:

Identify for the Commission record each Respondent Utility established "Standard of Conduct" found to have been breached by Utility employees resulting in the 2006 dispute account No. 34433-07009 alleged service bill and for each standard of conduct, state,

- a. The act or action by Utility Company superiors, upon discovering Standards of Conduct had been violated,
- b. Identify the supervisor involved in any corrective action, including correcting erroneous Debt Collection reports, for LOT # 23, 23067 Potter Trail Kirksville Mo. services, accounts, etc.

RESPONSE NO. 18:

No Ameren Missouri employee standard of conduct has been found to have been breached in connection with Complainant's electric utility service accounts.

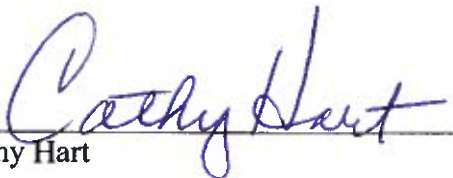
INTERROGATORY NO. 23:

Identify each expert, supervisor, manager, counsel, who have in past years permitted parties in dispute over alleged account issues, to inspect, view, "Customer-Specific" information, knowing that the requesting customer was in fact an Iowa Resident complaining party in a formal complaint before the Missouri Public Service Commission. In re: 4 CSR 240-2.135 Confidential Information, subpart (3) (C),; Subpart 240-2.135(4)(F).


RESPONSE NO. 23:

Ameren Missouri is unable to identify any such persons because Ameren Missouri is not aware of any previous dispute wherein an Iowa resident has filed a formal complaint with the Missouri Public Service Commission against Ameren Missouri and such resident has made a request or demand to inspect or view customer-specific information as that

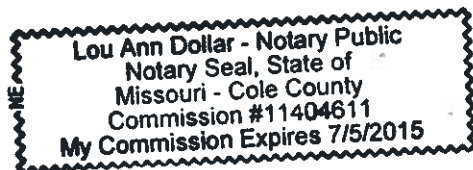
term is used in 4 CSR 240-2.135(3)(C) and (4)(F). In customer complaint cases, generally, however, where Ameren Missouri designates customer-specific information as highly confidential per 4 CSR 240-2.135(1)(B)1., Ameren Missouri does provide the highly confidential version of its pleadings to the customer/complainant.


Cathy Hart

Subscribed and sworn to before me this 16th day of November, 2011.


Notary Public LOU ANN DOLLAR

My commission expires: 7-5-2015



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