

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE  
STATE OF MISSOURI

FILED<sup>3</sup>

JUL 14 2009

Missouri Public  
Service Commission

Name: Jefferson Heights Apts LLC )  
Complainant )

vs. )

Case No. )

Company Name: Ameren UE )  
Respondent )

COMPLAINT

Complainant resides at 1505 Jefferson Heights Drive  
(address of complainant)

Jefferson City MO 65109

1. Respondent, AMEREN UE  
(company name)

of St. Louis Mo  
(location of company), is a public utility under the

jurisdiction of the Public Service Commission of the State of Missouri.

2. As the basis of this complaint, Complainant states the following facts:

See attached letter dated June 25, 2009  
protesting Disconnect Notice  
and Adjustment Notice, both  
attached.

3. The Complainant has taken the following steps to present this complaint to the Respondent:

Lined area for text entry.

WHEREFORE, Complainant now requests the following relief:

Cancellation of Adjustment Notice  
& Disconnect Notice.

7/15/09  
Date

Jefferson Heights Apts LLC  
by its Attorneys  
Signature of Complainant

Attach additional pages, as necessary.  
Attach copies of any supporting documentation.

John D. Landwehr  
231 Madison St.  
Jefferson City MO 65101  
(573) 635 7477  
MO BAR # 29587

Jefferson Heights Apartments LLC  
1505 Jefferson Heights Drive  
Jefferson City, MO 65109  
(573)635-1722

June 25, 2009

Secretary of the Missouri Public Service Commission  
ATTN: Data Center  
PO Box 360  
Jefferson City, MO 65102-0360

To Whom It May Concern:

Please consider this letter to be the formal complaint against Ameren UE, our electric and gas provider for back billing Jefferson Heights Apartments LLC in the amount of \$7,290.79 for (2) years prior. The behavior of Ameren UE in this circumstance is believed to be unethical.

Jefferson Heights Apartments LLC has received a disconnect notice for "failure to pay balance in full," of the disputed amount. Please note that we have continued to pay the current balance. The 25% credit authorized by Lana has also not been applied to the account. I have left multiple messages to address this matter. Enclosed is a copy of the aforementioned bill.

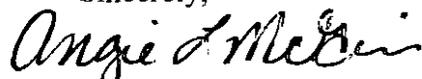
We have not received sufficient proof that the meter was indeed broken and the reading inaccurate. The new reading could be inaccurate as well. Jefferson Heights Apartments LLC is also concerned that the new billing rate has been applied to the previous charges.

The back-billing begins exactly the date of purchase of the property. Jefferson Heights Apartments LLC does not believe that this is a likely possibility.

The responsibility for accurate billing falls into the hands of the utility company. Had our company (JHA LLC) been informed that the rates were higher than indicated on the bill, less gas would have been used by turning down the water heaters, therefore, the usage would have decreased and this bill null and void. Jefferson Heights Apartments LLC has a budget and has worked diligently to sustain it. The back billing does not give the company a chance to calculate and adjust for the changes necessary in a timely manner.

Due to the current state of our economy, our small residential company struggles to make ends meet. Jefferson Heights Apartments LLC cannot afford this bill and believes it to be unreasonable, unfair, and demonstrates poor company management on the part of Ameren UE.

Sincerely,

  
Angie McGennis

# FINAL NOTICE PRIOR TO DISCONNECTION



Notice Date Jun 22, 2009

*Too late to mail. Pay by Credit Card or at an authorized Pay Agent.*

AMOUNT DUE	ACCOUNT NUMBER
\$7,326.65	83034-09123

Amt Paid \$ \_\_\_\_\_

JEFFERSON HEIGHTS APTS LLC  
PO BOX 106026  
JEFFERSON CITY MO 65110

AMEREN  
PO BOX 66700  
SAINT LOUIS MO 63166-6700

9030000 0083034091203 00865530 07326650 07326650

## FINAL NOTICE IMPORTANT - PLEASE READ THIS IMMEDIATELY

WITHOUT FURTHER NOTICE YOUR UTILITY SERVICE AT 1603 JEFFERSON HEIGHTS DR, WATER HEATERS, JEFFERSON CITY MO 65109

WILL BE DISCONNECTED UNLESS THE AMOUNT DUE OF \$7,326.65 IS PAID ON OR BEFORE JUL 02, 2009

FOR THE REASON(S) MARKED BELOW

- Past Due Balance
- Deposit Due
- Payment Returned

Account Number	Service to Date	Last Payment	Was Received on
83034-09123	JUN 03, 2009	\$1,313.73	MAY 20, 2009

**PLEASE CONTACT US NOW BEFORE YOUR SERVICE IS DISCONNECTED.**

### NOTICE:

IT IS NOW TOO LATE TO MAIL A PAYMENT, OR TO MAKE AN ONLINE PAYMENT WITH AN ELECTRONIC CHECK. PAYMENTS SHOULD BE MADE USING EITHER A CREDIT OR DEBIT CARD THROUGH SPEEDPAY (866.268.3729) OR IN PERSON AT AN AUTHORIZED PAY AGENT.

If the amount due shown above has not been paid by the date indicated, your service is subject to immediate disconnection. If your service is disconnected, you will be required to pay the full amount due plus a reconnection charge before service can be restored and you may be asked for a deposit. Should your service be disconnected, we will try to restore your service on the day we receive payment or the next business day. If this notice is regarding a returned item, a service charge will be billed to your account on your next bill.

If you cannot pay the above amount, it may be possible to arrange a payment plan. If you have any questions, you may call our Customer Contact Center during regular business hours of 7 a.m. to 7 p.m., Monday through Friday at 1-800-552-7583. For customers using Relay, dial 711.

IF PAYMENT OF THIS ACCOUNT HAS BEEN MADE, PLEASE DISREGARD THIS NOTICE. THANK YOU.

*left message for Lana on 6/29/09*



PO BOX 66700  
SAINT LOUIS MO 63166-6700  
1-800-552-7583

*called 7/8/09 - held 22 min  
left message w/ Lana.*

## Gas AMR/Index Spreadsheet Project

Customer Name  
 Account Number  
 Period Corrected:  
 Date Discrepancy Began & Rdg  
 Date Module Reprogrammed/Rdg

<b>JEFFERSON HEIGHTS APTS LLC</b>	
	83034-09123
8/01/07 TO 3/18/09	
8/01/07 READING: 80235	
3/18/09 READING: 96492	

From Date	To Date	Usage Pattern Y/R	Percent of Total Use	Adj Usage	Original CCFs Billed	Difference in CCFs	From Date	To Date	Original Billed Amount	Corrected Estimated Amount	Difference
08/02/04	8/31/04	968	0.0442	718	484	234	08/01/07	8/30/07	\$ 649.85	\$ 951.39	\$ 301.54
8/31/04	9/30/04	885	0.0404	657	484	173	8/30/07	10/1/07	\$ 650.75	\$ 873.70	\$ 222.95
9/30/04	10/31/04	1006	0.0459	746	484	262	10/1/07	10/30/07	\$ 650.75	\$ 988.38	\$ 337.63
10/31/04	12/1/04	1182	0.0539	877	925	-48	10/30/07	12/2/07	\$ 1,249.14	\$ 1,185.70	\$ (63.44)
12/1/04	1/4/05	1563	0.0713	1160	997	163	12/2/07	1/3/08	\$ 1,351.29	\$ 1,567.86	\$ 216.57
1/4/05	2/2/05	1528	0.0697	1134	1104	30	1/3/08	2/4/08	\$ 1,493.44	\$ 1,533.31	\$ 39.87
2/2/05	3/3/05	1405	0.0641	1042	1129	-87	2/4/08	3/4/08	\$ 1,526.66	\$ 1,411.07	\$ (115.59)
3/3/05	4/4/05	1506	0.0687	1117	1086	31	3/4/08	4/3/08	\$ 1,469.81	\$ 1,511.00	\$ 41.19
4/4/05	5/3/05	1186	0.0541	880	993	-113	4/3/08	5/5/08	\$ 1,347.32	\$ 1,197.18	\$ (150.14)
5/3/05	6/2/05	1144	0.0522	849	818	31	5/5/08	6/4/08	\$ 1,140.20	\$ 1,182.35	\$ 42.15
6/2/05	7/4/05	1074	0.0490	797	735	62	6/4/08	7/7/08	\$ 1,175.69	\$ 1,272.52	\$ 96.83
7/4/05	8/2/05	884	0.0403	656	278	378	7/7/08	8/4/08	\$ 462.05	\$ 1,052.33	\$ 590.28
8/2/05	8/31/05	891	0.0407	661	328	333	8/4/08	9/2/08	\$ 540.14	\$ 1,060.13	\$ 519.99
8/31/05	10/2/05	1075	0.0491	798	130	668	9/2/08	10/1/08	\$ 230.96	\$ 1,274.07	\$ 1,043.11
10/2/05	10/31/05	734	0.0335	545	354	191	10/1/08	10/30/08	\$ 580.75	\$ 878.99	\$ 298.24
10/31/05	12/1/05	458	0.0209	340	281	59	10/30/08	12/2/08	\$ 434.17	\$ 519.40	\$ 85.23
12/1/05	1/4/06	1382	0.0631	1025	207	818	12/2/08	1/5/09	\$ 326.66	\$ 1,505.29	\$ 1,178.63
1/4/06	2/2/06	1135	0.0518	842	149	693	1/5/09	2/3/09	\$ 243.09	\$ 1,241.60	\$ 998.51
2/2/06	3/5/06	1372	0.0626	1018	294	724	2/3/09	3/4/09	\$ 452.01	\$ 1,495.19	\$ 1,043.18
3/5/06	3/19/06	533	0.0243	395	0	395	3/4/09	3/18/09	\$	\$ 564.06	\$ 564.06
		0	0.0000	0		0					\$
		21911		16257	11260	4997					
		21911	100%	16257					\$ 15,974.73	\$ 23,265.52	\$ 7,290.79

done by

SJG