

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

Jefferson Heights Apartments, LLC,)	
Complainant,)	
)	
vs.)	Case No. GC-2010-0018
)	
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 July 14, 2009, Jefferson Heights Apartments, LLC of 1505 Jefferson Heights Drive, in Jefferson City, Missouri ("Complainant") initiated this proceeding by filing a Complaint against Union Electric Company, d/b/a AmerenUE ("the Company" or "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 the letter incorporated by reference in Paragraph 2 of the Complaint, Complainant alleges that AmerenUE rebilled Complainant \$ [REDACTED] for the two previous years. AmerenUE admits to rebilling Complainant \$ [REDACTED], however, the correct rebill period is from April 3, 2008 to March 18, 2009, a little less than twelve (12) months.

5. Complainant attached to their complaint a Final Notice Prior to Disconnection that they received from AmerenUE. It displays an amount due of \$ [REDACTED]. AmerenUE believes this exhibit accurately depicts the Final Notice Prior to Disconnection sent to Complainant.

6. Complainant also attached to their Complaint a spreadsheet for their account which displays, among other things, the kilowatt-hours transmitted by their AMR module from August 1, 2007 through March 18, 2009. AmerenUE believes this Exhibit accurately depicts the total CCFs that were under billed, but the corrected time period in the Company's Schedule 2HC is a more accurate representation of Complainant's under billed usage.

7. AmerenUE offers a few points of clarification. By way of background, Complainant has a natural gas account with AmerenUE. Service commenced for account number [REDACTED] on or about August 1, 2007. On March 18, 2009, AmerenUE discovered Complainant's gas Automated Meter Reading module ("AMR") was not transmitting properly. Upon further inspection, AmerenUE found that Complainant's gas meter was registering an accurate amount of usage and the issue was limited to the AMR module. The AMR module was not recording all of the actual usage.

8. The AMR module records gas usage and transmits that data to AmerenUE.

9. Based on the AMR module error, the Company determined from all related and available information the probable period during which the error condition existed and made billing adjustments for the estimated period involved.

10. Specifically, once AmerenUE discovered the slow AMR module readings, the Company performed a forensic data analysis to determine the time frame for module failure. Based on the data collected, AmerenUE determined the AMR module began to fail after April 22, 2008. This determination was made because on April 22, 2008 a Company representative installed a new AMR module on Complainant's gas meter. At that time, the usage on both the AMR module and the gas meter matched. ([REDACTED] Total CCFs). On March 18, 2009, another manual read of the Complainant's gas meter was taken. ([REDACTED] Total CCFs). This amount was substantially more than that being transmitted by Complainant's ARM module on March 18, 2009. ([REDACTED] Total CCFs on AMR module). By taking the accurate usage recorded by the Complainant's meter on March 18, 2009 and subtracting the last known accurate manual read of Complainant's gas meter on April 22, 2008, the Complainant's actual gas usage for that period was [REDACTED] total CCFs. However, the total CCFs billed, due to the AMR module error, was [REDACTED] total CCFs. This left an underbill of [REDACTED] CCFs.

11. AmerenUE initially incorrectly attributed the unbilled [REDACTED] CCFs to the period from August 1, 2007 through March 18, 2009. (see Complainant's second exhibit). The corrected time period includes the billing periods from April 3, 2008 through March 18, 2008.

12. The company applied the appropriate billing rates for the estimated period involved.

13. The total amount owed by Complainant to Company for the adjusted unbilled [REDACTED] CCFs is \$ [REDACTED]. However, because the original rebill time period began on August 1, 2007, the Company will admit and be bound by the original unbilled amount of \$ [REDACTED]. (see Complainant's second exhibit).

14. AmerenUE made the billing adjustment from April 3, 2008 through March 18, 2008 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 registrations due to improper meter connections, the application of an improper meter constant, improper application of any rate schedule not selected by customer, or similar reasons, shall be subject to adjustment for the current and twenty-four (24) prior billing periods, as can be substantiated by Company records."

15. Attached as Schedule 1HC to this Answer is a spreadsheet of actual AMR module readings and actual meter readings of Complainant's gas meter from August 1, 2007 through August 3, 2009.

16. Attached as Schedule 2HC to this Answer is a spreadsheet of the increased usage allocated over the revised under billing period.

17. The following attorneys should be served with all pleadings in this case:

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

Respectfully submitted,

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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 14th day of August, 2009.

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