

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

KEELEEE SWOPSHIRE,)	
)	
)	
)	EC-2022-0149
vs.)	
)	
UNION ELECTRIC COMPANY dba)	
AMEREM MISSOURI,)	
)	
Respondent.)	

ANSWER AND AFFIRMATIVE DEFENSES

COMES NOW Union Electric Company dba Ameren Missouri (“Ameren Missouri”) and for its Answer and Affirmative Defenses states:

1. Paragraph one contains an allegation to which no response is required.
2. Ameren Missouri agrees that the service was for the property located at 3029 Lafayette Avenue, Apartment 109, St. Louis, Missouri 63104. Ameren Missouri provided service to the property for the time period of August 17, 2019 through October 25, 2021.
3. Paragraph three is correct.
4. Paragraph four is correct.
5. Paragraph five is incorrect and denied. By way of further answer, Ameren Missouri states that Complainant received the bill for \$377.63, the service was for the property located at 3029 Lafayette, Apartment 109, St. Louis, Missouri 63104, and the service was correct.
6. Paragraph six is incorrect and denied. By way of further answer, Ameren Missouri states on October 19, 2021 the AMR electric meter #55717737 was switched to AMI meter #44272640. This is the meter that metered usage for 3029 Lafayette, Apartment 109 and led to

Complainant properly being billed for \$377.63, when the service was shut off on October 25, 2021 and billing ceased. Electric meter #44050928 is for the public lighting for the building and serves the lights in the maintenance storage areas as well as lights for the walkway for the apartment building.

7. Paragraph seven is incorrect and denied. By way of further answer, Ameren Missouri states that meter #44050928 is for the public lighting for the building, not Apartment 109 which is where meter #44272640 meters the electricity usage.

8. Paragraph eight is incorrect and denied. By way of further answer, Ameren Missouri instructed a field special inspector to examine the circumstances surrounding Complainant's former residence. He confirmed that meter #44050928 is for the public lighting and meter #44272640 is the meter for Apartment 109.

AFFIRMATIVE DEFENSES

1. Complainant has failed to set forth a cause of action upon which relief can be granted. The Commission is a body created by statute with limited jurisdiction. The relief requested by Complainant would require the Commission to violate applicable statutes, regulations, order, and tariffs.

2. Complainant has requested that the Commission approve a special dispensation that would allow her to enjoy privileges that are not afforded other customers who are similarly situated.

WHEREFORE, Ameren Missouri requests the Commission enter an Order setting the matter of whether it has violated a statute, regulations, or order for hearing and grant any further

relief which it deems fit and proper.

Respectfully Submitted,

BANKS LAW LLC

/s/ Eric Kendall Banks

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CERTIFICATE OF SERVICE

I, Eric Kendall Banks, as counsel for Union Electric dba Ameren Electric, do hereby certify that a copy of the foregoing Answer and Affirmative Defenses was filed with the Missouri Public Commission via EFIS. Copies have also been served electronically to the below parties at their respective email addresses of this 20 day of December, 2021.

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