

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

Linda Shivers,)	
)	
Complainant,)	
)	
v.)	Case No. EC-2009-0271
)	
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 January 22, 2009, Linda Shivers of 261 Roderick Drive, St. Louis, Missouri 63137 (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 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 of the *Complaint*, Complainant alleges she was improperly rebilled and that she does not owe any additional amount to the Company. AmerenUE denies these allegations.

5. Sometime between March 5, 2008 and April 6, 2008, Complainant's electric meter started showing significantly lower usage. This continued until around June 4, 2008, when the meter stopped showing any usage. After several zero usage readings, AmerenUE attempted

to change the meter on September 15, 2008, but found the gate locked. A letter was sent to Complainant requesting access to change the meter and on October 8, 2008, Complainant sent AmerenUE an email in response. AmerenUE changed the meter the following day, on October 9, 2008.

6. On November 3, 2008, a corrected bill in the amount of \$**[REDACTED]** was issued. The rebill was computed according to its Commission approved tariffs. That calculation is attached as Exhibit 1HC and the billing history for Complainant is attached as Exhibit 2HC.

7. The Company's billing system generates a notice to check a meter if it shows zero usage for three months. That is exactly what occurred in this case. During this time, Complainant received four bills which only billed her for the customer charge.

8. The Complainant alleges that her meter ran fast and, accordingly, that she is entitled to a refund. Complainant offers no evidence that her meter ran fast at any time and AmerenUE denies this allegation.

9. While the Company understands that no customer is happy to receive a corrected bill when it results in a higher bill, AmerenUE has acted within the terms of its tariffs and believes this rebill is correct.

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

Respectfully submitted,

By: /s/ Wendy K. Tatro
Steven R. Sullivan, MBE No. 33102
Sr. Vice President, General
Counsel and Secretary

NP

Wendy K. Tatro, MBE No. 60261
Associate General Counsel
Ameren Services Company
P. O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
(314) 554-3484 (Direct Line)
(314) 554-4014 (Facsimile)
AmerenUEService@ameren.com

Dated: February 26, 2009

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 26th day of February, 2009.

General Counsel's Office
Missouri Public Service Commission
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, Missouri 65102
gencounsel@psc.mo.gov

Office of Public Counsel
Lewis R. Mills, Jr.
P.O. Box 2230
200 Madison Street, Suite 650
Jefferson City, MO 65102-2230
opcservice@ded.mo.gov

Linda Shivers
261 Roderick Drive
St. Louis, MO 63137

/s/ Wendy K. Tatro

Wendy K. Tatro

Exhibits 1 and 2
have been designated as
Highly Confidential
and have been removed from this document.