

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

Dr. Michael and Sharon Maples,)	
Complainants,)	
)	
vs.)	Case No. GC-2007-0350
)	
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 March 23, 2007, Dr. Michael and Sharon Maples (Complainants) initiated this proceeding by filing a Complaint against AmerenUE.

2. In paragraph 1 of the Complaint, Complainants 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 (Commission). AmerenUE admits the allegations contained in paragraph 1 of the Complaint.

3. In paragraph 2 of the Complaint, Complainants make multiple statements. The Company admits that Complainants were AmerenUE customers while residing at 403 E. 10th Street in Rolla, Missouri between 2001 and 2006. The Company admits that the natural gas meter was removed in February of 2006, that it was tested by AmerenUE and that it was found to be functioning properly. AmerenUE also admits that an incorrect form letter was sent to Complainants with the results of that test. AmerenUE denies all other allegations in this paragraph. The Company agrees with the Complainants

admission that they stopped paying their natural gas bill after the meter was changed in February of 2006.

4. AmerenUE replaced the meter at the Complainants home on or around February 9, 2006. The meter was tested on that same date and the results demonstrated that the meter was accurate. The meter tested 99.30 on an Open Run and 99.50 on the Check Run. Attachment 1.

5. After the meter was changed, Complainants received two bills. The first bill was for [REDACTED] CCF of usage between January 30, 2006 and February 28, 2006. The second bill was for [REDACTED] CCF of usage between February 28, 2006 and March 29, 2006. AmerenUE recognizes that these amounts are less than the usage in the previous year ([REDACTED] CCF for January 27, 2005 - February 25, 2006 and [REDACTED] CCF for February 25, 2005 - March 29, 2005), but AmerenUE believes this difference is not attributable to the meter change.

6. The Complainants' bill for usage between December 28, 2005 and January 30, 2006, which is the bill immediately prior to the change of the meter, was estimated because AmerenUE was unable to obtain access to the meter on the Complainants' property. The estimated bill was for [REDACTED] CCF. However, January of 2006 was a warmer month than normal. Information from the National Weather Service at both Lambert Field (Attachment 2) and the Columbia Regional Airport (Attachment 3) demonstrate this fact. Accordingly, some of the estimated usage billed likely did not actually occur until the following month. The meter was changed on February 9, 2006. A review of the heating degree days shows that 290 of the 464 degree days for February,

or 62.5%, occurred between February 1, 2006 and February 9, 2006. Attachment 3. AmerenUE believes that these facts account for the lower bill for February.

7. The last bill on this account was for usage between February 28, 2006 and March 29, 2006. This bill was lower than the previous year, but the number of heating degree days was lower in March of 2006 than in March of 2005. Attachments 3 and 4. Additionally, the existence of a lower bill for the month of March was not a one time occurrence. A review of the Complainants' history of gas usage shows that a similar, lower usage for the month of March also occurred in 2004. Attachment 5.

8. Finally, AmerenUE is unsure when the Complainants moved from the 10th Street location to their current address of 10600 Bennish Lane. Lloyd Davis, a contract meter reader who was at the Complainants' 10th Street residence in February of 2006, was told by Mr. Maples that the family was moving and witnessed the removal of personal belongings from the residence during his visit. A records search indicates that both residences are owned by Eileen Wolf, an individual that the Company believes is the mother of Sharon Maples. Complainants stated in response to data requests that there is no written lease or other document for either address to verify when the move occurred. Attachment 6. An Accurint search places Complainants at the 10600 Bennish Lane address as early as February of 2006. AmerenUE requested electric and/or gas records from the new address, but has not been provided that information as of this date. If Complainants moved out during the month of March, it would also help explain the lower usage for that time period.

9. While it is certainly understandable that Complainants would interpret the lower bills after the meter change as proving that the original meter was inaccurate,

AmerenUE submits that it does not. Further, the Company believes that a closer review of all the facts in this case demonstrate that other factors account for the difference.

10. Complainants ask that the Commission award them \$5,170.23, which is alleged to represent amounts overcharged by the Company since June of 2001. AmerenUE believes there is insufficient evidence to prove that any overcharge occurred and believes that all billing was proper. Instead, AmerenUE believes that the Complainants owe \$1,970.73 for natural gas service at 403 E. 10th Street in Rolla, Missouri. Attachment 7.

11. AmerenUE believes that it has at all times acted properly and requests the Commission issue an order finding this Complaint to be without merit and to find that the Complainants owe AmerenUE \$1,970.73.

WHEREFORE, AmerenUE respectfully requests that the Commission issue its order finding that AmerenUE has acted appropriately, that this Complaint without merit and that the Complainants owe AmerenUE \$1,970.73.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

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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 26th day of April, 2007.

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