

Exhibit No.:
Issues: Unmetered Service
Billing Adjustment
Witness: Debra Buhr
Type of Exhibit: Rebuttal Testimony
Sponsoring Party: Union Electric Co. d/b/a AmerenUE
Case No.: GC-2002-388

REBUTTAL TESTIMONY
of
DEBRA BUHR
on behalf of
UNION ELECTRIC COMPANY
d/b/a AMERENUE

FILED³
AUG 30 2002
Missouri Public
Service Commission

MISSOURI PUBLIC SERVICE COMMISSION
CASE NO. GC-2002-388
Barbara Ross v. AmerenUE

St. Louis, Missouri
August 30, 2002

REBUTTAL TESTIMONY

Of

DEBRA BUHR

on behalf of

UNION ELECTRIC COMPANY d/b/a AMERENUE

Barbara Ross v. AmerenUE

CASE NO. GC-2002-388

Q. Please state your name, position, and address.

A. My name is Debra Buhr. I am a Supervisor in the St. Louis, Missouri Customer Contact Center at AmerenUE, 1901 Chouteau Avenue, St. Louis, Missouri 63103. I have held this position since 1991.

Q. What are your primary job duties?

A. My primary job duties include investigating, responding and resolving, if possible, consumer complaints and inquiries from various public interests and government agencies including the Missouri Public Service Commission, the Better Business Bureau and local media. In this capacity I coordinate with various departments within the Company to gather responsive information.

Q. Have you reviewed the complaint filed by Ms. Ross with the Missouri Public Service Commission?

A. Yes, I have. Ms. Ross filed a complaint with the MPSC disputing certain charges associated with gas service provided by Union Electric Company during a period in which the gas meter at her home failed to register usage.

Q. During what period of time did the gas meter at Ms. Ross's home fail to properly measure gas usage?

1 A. Appended to my testimony is Schedule A which summarizes the gas usage and
2 charges for Ms. Ross's residence during the period January 2001 through January 2002. As set
3 forth in that schedule, the gas meter readings on bills dated July 31, August 29, September 30,
4 October 29 and November 28, 2001 all registered the same number – 9573. The fact that the
5 reading number did not change reflects that the gas meter registered zero usage for that period.

6 **Q. Does the Company believe that, notwithstanding the meter reading, Ms. Ross**
7 **used natural gas at her home during this period?**

8 A. Yes.

9 **Q. What is the basis for the Company's belief?**

10 A. Ms. Ross states that she was at her residence during this time. Furthermore, she
11 timely paid her electric and gas bills.

12 **Q. When did the Company first discover that the meter failed to measure gas**
13 **usage?**

14 A. The Company runs a report in November of each year to identify all zero usage
15 accounts. These accounts are then further examined to determine if the zero usage reflects an
16 accurate reading or whether equipment or some other failure has occurred. November is used
17 because typically it is the first reliable month in which a gas furnace would be used.

18 **Q. Why didn't the Company discover the meter malfunction earlier?**

19 A. Zero usage does not always equate to an equipment malfunction. The Company
20 has no way of knowing the specific appliances a gas customer may have in their home. For
21 example, if a customer has an electric stove, washer and dryer, or water heater, then a zero usage
22 reading during the summer may not be indicative of a faulty reading. On the other hand, if the
23 same customer has a gas furnace that only consumes gas during the winter, a monthly bill that

1 records zero usage during a cold weather month is indicative of some sort of system (billing or
2 equipment) problem. The report is run in November so as to focus on those accounts where
3 there is a stronger likelihood of some sort of external problem.

4 **Q. When was the gas meter either replaced or repaired?**

5 A. The meter was replaced on December 8, 2001 and the replacement meter has
6 functioned properly since that time.

7 **Q. During the period in which the meter failed to register, did the Company bill**
8 **Ms. Ross for gas service?**

9 A. Ms. Ross received a bill that reflected the fixed, monthly customer charge
10 (including tax) of \$9.63. She was not billed for gas consumed during this period.

11 **Q. After the Company replaced the meter, did it issue a revised bill to Ms. Ross**
12 **for gas service?**

13 A. Yes it did. On January 10, the Company issued a bill totaling \$218.91 which
14 included a revised, "catch-up" bill of \$89.25.

15 **Q. Is the \$89.25 the amount in dispute that is before the Commission in this**
16 **case?**

17 A. Yes. The specific methodology used by the Company in this case is fairly new.
18 Regrettably, the Company issued several bills to Ms. Ross that contained differing amounts as to
19 estimated charges. As the Missouri Public Service Commission Staff noted in their investigative
20 report, the correct estimate should be \$113.03. Nevertheless, the Company is standing by its
21 original bill of \$89.25, as it is more advantageous to Ms. Ross.

22 **Q. How did the Company calculate gas service charges for the July through**
23 **November 2001 period in which the gas meter was not registering properly?**

1 A. Since the actual gas usage amount was unknown, the Company prepared a bill
2 based upon an estimate of likely usage.

3 **Q. How was this estimate calculated?**

4 A. The estimate of unmetered service was calculated based on Ms. Ross's gas usage
5 during the applicable comparison period in 2000, along with the number of heating degree days
6 for the corresponding period in 2001. (The calculation assumes that base, non-seasonal usage
7 will remain relatively constant from one period to the next.) Since temperatures can vary from
8 one year to the next, heating degree days are used to convert the prior year's monthly usage into
9 the estimated usage. Since this estimate assumes gas usage patterns remain constant, the
10 Company is willing to make adjustments if the customer believes that their actual usage level is
11 less than the comparison period. Ms. Ross, however, contends she should not be responsible for
12 *any* portion of the unmetered service.

13 **Q. Is the methodology for estimating bills incorporated within the Company's**
14 **tariffs?**

15 A. Yes. Tariff Nos. 56, 57 and 57.1 describe the methodology used in calculating
16 her "catch-up" bill.

17 **Q. How does the \$89.25 estimated, nonmetered service compare to the actual**
18 **metered charges on Ms. Ross's account for the same period during calendar year 2000?**

19 A. For the July through November 2000 time period, Ms. Ross's actual metered
20 service was \$151.88.

21 **Q. Has the Company charged Ms. Ross late fees associated with the disputed**
22 **amount?**

23 A. No.

1 **Q. Does this conclude your testimony.**

2 **A. Yes, it does.**

Bill History for 103 Belair Dr.

Bill Dates	Elec \$	Gas \$	Gas Rdg	Gas Use	Adj.	Amount	Amt Paid	Date Paid
03/02/2000 to 04/02/2000	30.29	47.22	8796	59.0	-5.73	71.78	71.78	04/09/2000
04/02/2000 to 05/01/2000	27.57	30.88	8830	34.0	-5.76	52.69	52.69	05/09/2000
05/01/2000 to 05/31/2000	56.03	23.01	8852	22.0		79.04	79.04	06/04/2000
05/31/2000 to 06/29/2000	75.17	21.04	8871	19.0		96.21	96.21	07/14/2000
06/29/2000 to 07/31/2000	111.09	21.20	8889	18.0		132.29	132.29	08/09/2000
07/31/2000 to 08/29/2000	108.13	22.82	8906	17.0		130.95	130.95	09/09/2000
08/29/2000 to 09/27/2000	50.85	21.98	8922	16.0		72.83	72.83	10/16/2000
09/27/2000 to 10/26/2000	28.06	29.53	8947	25.0		57.59	57.59	11/01/2000
10/26/2000 to 11/28/2000	32.57	88.16	9033	86.0	-5.21	115.52	115.52	12/10/2000
11/28/2000 to 01/01/2001	36.70	152.86	9187	154.0		189.56	189.56	01/15/2001
01/01/2001 to 01/31/2001	31.03	123.09	9309	122.0		154.12	154.12	02/16/2001
01/31/2001 to 03/04/2001	31.51	111.00	9418	109.0		142.51	142.51	03/11/2001
03/04/2001 to 04/02/2001	28.56	84.59	9499	81.0		113.15	113.15	04/07/2001
04/02/2001 to 05/01/2001	36.22	34.56	9528	29.0	-6.78	64.00	64.00	05/14/2001
05/01/2001 to 05/31/2001	45.16	27.69	9549	21.0		72.85	72.85	06/08/2001
05/31/2001 to 07/01/2001	86.30	26.83	9569	20.0		113.13	113.13	07/09/2001
07/01/2001 to 07/31/2001	119.00	13.07	9573	4.0		132.07	132.07	08/14/2001
07/31/2001 to 08/29/2001	110.75	9.63	9573	0.0		120.38	120.38	09/08/2001
08/29/2001 to 09/30/2001	45.73	9.63	9573	0.0		55.36	55.36	10/06/2001
09/30/2001 to 10/29/2001	27.08	9.63	9573	0.0		36.71	36.71	11/04/2001
10/29/2001 to 11/28/2001	28.62	9.63	9573	0.0		38.25	38.25	12/16/2001
12/08/2001	Removal Reading		9573					
12/08/2001	New Meter Set Reading		6603					
11/28/2001 to 01/01/2002	42.33	87.33	6693	90.0	89.25	218.91	129.66	01/18/2002
01/01/2002 to 01/31/2002	30.54	98.42	6802	109.0		128.96	128.96	02/07/2002
01/31/2002 to 03/03/2002	31.09	91.09	6902	100.0		122.18	122.18	03/16/2002
03/03/2002 to 04/02/2002	29.06	69.23	6975	73.0		98.29	98.29	04/21/2002
04/02/2002 to 05/01/2002	31.83	36.55	7007	32.0	1.34	69.72	69.72	05/07/2002
05/01/2002 to 06/02/2002	81.43	28.98	7030	23.0		110.41	110.41	06/10/2002
06/02/2002 to 07/01/2002	89.60	19.72	7042	12.0		109.32	109.32	07/12/2002
07/01/2002 to 07/31/2002	133.62	22.24	7057	15.0		155.86	155.86	08/09/2002
						-89.25	Estimated Bill Cancelled	
						113.03	Estimated Bill Corrected	
						-23.78	Adjustment on Corrected Bill	

\$1,615.92 \$1,371.61

\$3,054.64

\$67.11 \$3,054.64

\$2,965.39

Account Balance as of 03/22/02:

\$ 89.25

File View Window Help



ROSS BARBARA S		ACTIVE	01
103 BELAIR DR		486-58-2996	69
JEFFERSON CITY MO 65109	866308811251	3 b	2
		(573)635-7779	

Bill Detail - Payment / Adjustment

Bill Detail

Read Date	Bill Date	Total Amt Due	Misc	Arrears	Rw	Net Elec	Net Gas	MPC Tax	Sales Tax	Fuel/PGA Adj	Fuel Rt	PGA Rt	Due Date
05/01/2002	05/03/2002	158.97	*	89.25		29.75	34.16	3.83	.64	18.91		.5808	05/15/2002
04/02/2002	04/04/2002	187.54		89.25		27.16	64.71	5.50	.92	41.43		.5675	04/16/2002
03/03/2002	03/22/2002	113.03	*	-32.93		29.06	85.14	6.84	1.14	56.58		.5658	04/04/2002
03/03/2002	03/12/2002	213.77	*	89.25		29.06	85.14	6.84	1.14	56.58		.5658	03/22/2002
03/03/2002	03/07/2002	211.43	*	89.25		29.06	85.14	6.84	1.14	56.58		.5658	03/15/2002
03/03/2002	03/05/2002	212.77	*	89.25		29.06	85.14	6.84	1.14	56.58		.5658	03/15/2002
01/31/2002	02/04/2002	218.21		89.25		28.54	91.99	7.22	1.21	61.67		.5658	02/14/2002
01/01/2002	01/08/2002	218.91	*	-38.52		39.56	117.63	9.41	1.58	53.52		.5946	01/18/2002
01/01/2002	01/03/2002	0			NB							.5672	
11/28/2001	11/30/2001	38.25				26.75	9.00	2.14	.36			.5686	12/12/2001
10/29/2001	10/31/2001	36.71				25.31	9.00	2.06	.34			.6083	11/13/2001
09/30/2001	10/02/2001	55.36				42.74	9.00	3.10	.52			.6083	10/12/2001
08/29/2001	08/31/2001	120.38				103.51	9.00	6.74	1.13			.6083	09/13/2001
07/31/2001	08/02/2001	132.07				111.23	12.22	7.39	1.23	2.43		.6083	08/14/2001
07/01/2001	07/03/2001	113.13				80.66	25.08	6.33	1.06	12.17		.6083	07/16/2001
05/31/2001	06/04/2001	72.85				42.21	25.88	4.08	.68	12.77		.6083	06/14/2001
05/01/2001	05/03/2001	64.00	*			33.85	32.31	3.96	.66	17.64		.6083	05/15/2001
04/02/2001	04/04/2001	113.15				26.69	79.07	6.33	1.06	54.23		.6695	04/17/2001
03/04/2001	03/06/2001	142.51				29.46	103.75	7.97	1.33	73.43		.6737	03/16/2001
01/31/2001	02/02/2001	154.12				29.00	115.05	8.63	1.44	82.19		.6737	02/14/2001
01/01/2001	01/10/2001	189.56				34.31	142.87	10.61	1.77	103.75		.6737	01/23/2001
01/01/2001	01/03/2001	185.19				34.31	138.79	10.36	1.73	103.75		.6737	01/16/2001
11/28/2000	11/30/2000	115.52	*			30.45	82.41	6.75	1.12	57.09		.6638	12/12/2000
10/26/2000	10/30/2000	57.59				26.23	27.60	3.22	.54	15.21		.6083	11/09/2000
09/27/2000	09/29/2000	72.83				47.52	20.54	4.08	.69	9.73		.6083	10/11/2000
08/29/2000	08/31/2000	130.95				101.07	21.33	7.33	1.22	10.34		.6083	09/13/2000
07/31/2000	08/02/2000	132.29				103.83	19.81	7.41	1.24	8.65		.4806	08/14/2000
06/29/2000	07/03/2000	96.21				70.26	19.66	5.39	.90	8.32		.438	07/14/2000
05/31/2000	06/02/2000	79.04				52.37	21.50	4.43	.74	9.64		.438	06/14/2000
05/01/2000	05/03/2000	52.69	*			25.77	26.86	3.27	.55	14.89		.438	05/15/2000
04/02/2000	04/04/2000	71.78	*			28.31	44.14	4.34	.72	25.78		.437	04/14/2000

Bill Date	Tran Date	Srcr/ Ratch	Tran Amt	Reconciliation	Tran	Src
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Bill Amounts

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ROSS BARBARA S		ACTIVE	01
103 BELAIR DR		486-58-2996	69
JEFFERSON CITY MO 65109		066308811251	573)635-7779

Meter 1	Meter 2	Meter 3	Meter 4	Dusk/Dawn													
Read Date	Bill Date	A U D	U S E	R D G	S P R	N O R	Days	Reading	Usage	BTU Rt	Gross Amount	SVC From Date	SVC From Reading	CIF/ SM	CIF Date Begin	CIF Date End	
01/31/2001	02/02/2001						30	9309	1220	1.000	123.09	01/01/2001	9187				
01/01/2001	01/10/2001			RB			30	9187	1540	1.000	152.86	11/28/2000	9033				
01/01/2001	01/03/2001						30	9187	1540	1.000	148.49	11/28/2000	9033				
11/28/2000	11/30/2000						30	9033	860	1.000	88.16	10/26/2000	8947				
10/26/2000	10/30/2000						30	8947	250	1.000	29.53	09/27/2000	8922				
09/27/2000	09/29/2000						30	8922	160	1.000	21.98	08/29/2000	8906				
08/29/2000	08/31/2000						30	8906	170	1.000	22.82	07/30/2000	8889				
07/30/2000	08/02/2000						30	8889	180	1.000	21.20	06/29/2000	8871				
06/29/2000	07/03/2000						30	8871	190	1.000	21.04	05/31/2000	8852				
05/31/2000	06/02/2000						30	8852	220	1.000	23.01	05/01/2000	8830				
05/01/2000	05/03/2000						30	8830	340	1.000	30.88	04/02/2000	8796				
04/02/2000	04/04/2000						30	8796	590	1.000	47.22	03/02/2000	8737				
03/02/2000	03/06/2000						30	8737	850	1.000	64.39	02/01/2000	8652				
02/01/2000	02/03/2000						30	8652	1170	1.000	85.37	01/02/2000	8535				
01/02/2000	01/04/2000						30	8535	1100	1.000	80.79	11/30/1999	8425				
11/30/1999	12/02/1999						30	8425	500	1.000	40.79	10/28/1999	8375				
10/28/1999	11/01/1999						30	8375	310	1.000	26.30	09/29/1999	8344				
09/29/1999	10/01/1999						30	8344	170	1.000	18.35	08/31/1999	8327				
08/31/1999	09/02/1999						30	8327	150	1.000	17.20	08/02/1999	8312				
08/02/1999	08/04/1999						30	8312	150	1.000	17.20	07/01/1999	8297				
07/01/1999	07/06/1999						30	8297	220	1.000	21.19	05/28/1999	8275				
05/28/1999	06/04/1999						30	8275	200	1.000	20.05	05/03/1999	8255				
05/03/1999	05/05/1999						30	8255	430	1.000	33.11	03/31/1999	8212				
03/31/1999	04/06/1999						30	8212	810	1.000	59.98	03/03/1999	8131				
03/03/1999	03/05/1999						30	8131	980	1.000	70.95	01/30/1999	8033				
01/30/1999	02/03/1999						30	8033	1410	1.000	98.28	12/30/1998	7892				
12/30/1998	01/05/1999						30	7892	1110	1.000	79.21	11/27/1998	7781				

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Gas Readings and Use

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ROSS BARBARA S		ACTIVE	D1
103 BELAIR DR		486-58-2996	69
JEFFERSON CITY MO 65109		366308811251	5 b 2 (573)635-7779

Meter 1	Meter 2	Meter 3	Meter 4	Dusk/Dawn															
Read Date	Bill Date	A U D	U S E	R D G	S P R	N O R	Days	Reading	Usage	BTU Rt	Gross Amount	SVC From Date	SVC From Reading	CIF/ SM	CIF Date Begin	CIF Date End			
05/01/2002	05/03/2002						30	7007	320	1.000	36.55	04/02/2002	6975						
04/02/2002	04/04/2002						30	6975	730	1.000	69.23	03/03/2002	6902						
03/03/2002	03/22/2002			RB			30	6902	1000	1.000	91.09	01/31/2002	6802						
03/03/2002	03/12/2002			RB			30	6902	1000	1.000	91.09	01/31/2002	6802						
03/03/2002	03/07/2002		RC	RB			30	6902	1000	1.000	91.09	01/31/2002	6802						
03/03/2002	03/05/2002						30	6902	1000	1.000	91.09	01/31/2002	6802						
01/31/2002	02/04/2002						30	6802	1090	1.000	98.42	01/01/2002	6693						
01/01/2002	01/08/2002	AC	RB	RB			155	6693	900	1.000	125.85	12/08/2001	6603	STOPPED					
12/08/2001	01/08/2002			RB			131	9573	0	1.000	0	07/30/2001	9573	STOPPED					
01/01/2002	01/03/2002	AC	NB				34	6693	0	1.000	0	12/08/2001	6603	STOPPED					
12/08/2001	01/03/2002		NB				0	9573	0	1.000	0	11/28/2001	9573	STOPPED					
11/28/2001	11/30/2001						30	9573	0	1.000	9.63	10/29/2001	9573						
10/29/2001	10/31/2001						30	9573	0	1.000	9.63	09/29/2001	9573						
09/29/2001	10/02/2001						30	9573	0	1.000	9.63	08/29/2001	9573						
08/29/2001	08/31/2001						30	9573	0	1.000	9.63	07/30/2001	9573						
07/30/2001	08/02/2001						30	9573	40	1.000	13.07	07/01/2001	9569						
07/01/2001	07/03/2001						30	9569	200	1.000	26.83	05/31/2001	9549						
05/31/2001	06/04/2001						30	9549	210	1.000	27.69	04/30/2001	9528						
04/30/2001	05/03/2001						30	9528	290	1.000	34.56	04/02/2001	9499						
04/02/2001	04/04/2001						30	9499	810	1.000	84.59	03/04/2001	9418						
03/04/2001	03/06/2001						30	9418	1090	1.000	111.00	01/31/2001	9309						
01/31/2001	02/02/2001						30	9309	1220	1.000	123.09	01/01/2001	9187						
01/01/2001	01/10/2001			RB			30	9187	1540	1.000	152.86	11/28/2000	9033						
01/01/2001	01/03/2001						30	9187	1540	1.000	148.49	11/28/2000	9033						
11/28/2000	11/30/2000						30	9033	860	1.000	88.16	10/26/2000	8947						
10/26/2000	10/30/2000						30	8947	250	1.000	29.53	09/27/2000	8922						
09/27/2000	09/29/2000						30	8922	160	1.000	21.98	08/29/2000	8906						

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Gas Readings and Use

CERTIFICATE OF SERVICE

Pursuant to 4 CSR 240-2.080 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day caused a copy of the foregoing *Rebuttal Testimony of Debra Buhr* on behalf of AmerenUE to be served on all persons on the official service list in Case No. GR-2002-388.

Dated at St. Louis, Missouri, this 30th day of August 2002.

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Missouri Public Service Commission
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Susan B. Knowles