

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

MARLYN YOUNG

Complainant,

v.

UNION ELECTRIC d/b/a/
AMEREN UE,

Respondent,

Case# EC-2007-0273

REQUEST FOR ADMISSION

Complainant pursuant to Missouri Civil Rules of Procedure Rule 59.01 and Rule 56.01(b) move that Ameren Union Electric admit to the following statements of fact:

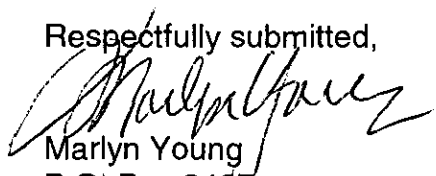
1. Admit that the Respondent billed Complainant for electric service charges from 07-13-2005 thur 08-11-2005 in the amount of \$390.75 for account number 79686-05126.
2. Admit that the Complainant paid service charges in the amounts of \$174.71 and \$178.10 which totaled \$352.81 for account Number 79686-05126.
3. Admit that the Complainant's owed a balance of \$37.94 for account number 79686-05126.
4. Admit that the Respondent provided complainant a final bill for account number 79686-05126 for electric service charges in the amount of \$70.29 between 08-11-2005 thur 08-24-2005.
5. Admit that the Respondent had also generated electric services charges to

Complainant between 08-11-2005 thur 09-02-2005 in the amount of \$65.02 for account number 79686-05135.

6. Admit that the Complainant had removed himself from 8831 May Ave. St. Louis, Mo, on or about July 28, 2005.
7. Admit that the Respondent was billing two electric service accounts Simultaneously in the month of August 2005.
8. Admit that Respondent never returned the balance of his Deposit to Complainant of \$178.00, less \$37.94 which is \$140.00 from account number 79686-05126.
9. Admit that the Respondent had already assigned an account number to the Complainant's premises at 2437 Wieck Dr. St. Louis, MO, in August 2005, Account number 88694-05145 with an amount paid of \$50.37.
10. Admit that the Respondent transferred debit charges in the amount of \$533.65 from 79686-05126 to account number 79686-05135 between 10-11-2005 thur 11-09-2005.
11. Admit that the Respondent's service charges between 10-11-2005 thur 11-09-2005 were \$273.03 for account number 79686-05135.
12. Admit that Respondent's Staff Report to the Commission dated 24 March 2006 indicated on page 3, the first paragraph of a continued paragraph from Page 2, quotes " that 72.56 was absorbed by Ameren UE on account number 79686-05135 and \$108.23 was transferred back to 79686-05126 from 09-12-2005 thur December 12-2005.
13. Admit that Respondent transferred \$108.23 to an inactive account number 79686-05126.

14. Admit that the Respondent also indicated in this report in the same paragraph and pages that Respondent had closed account number after December 2005.
15. Admit that Respondent that between March 6, 2006 and April 5, 2006 Ameren UE transferred debit from account number 79686-05135 to 88694-05145.
16. Admit that Respondent took no action in removing transferred debits from account number 79686-05126 that were transferred to account number 79686-05135.
17. Admit that Respondent took no action in removing transferred debits from Account number 79686-05135 that were transferred to account number 88694-05145.
18. Admit that the Respondent took electric meter readings for account number 79686-05135 from August thru December 2005, and assess monetary amounts or value to the electric readings.
19. Admit that the Respondent attempted to disconnect Complainant electric service in March 2007 while Complainant formal complaint was being disputed before the Commission.
20. Admit that the Respondent attempted to disconnect Complainant electric service in June 2007 while Complainant formal complaint was being disputed before the Commission.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Marilyn Young", written over the printed name.

Marilyn Young

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