

Exhibit No.:
Issues: Delivery of Disconnect Notices
Witness: Judy Rowe
Sponsoring Party: AmerenUE
Type of Exhibit: Rebuttal Testimony
Case No.: EC 2002-112
Date Testimony Filed: May 31, 2002

REBUTTAL TESTIMONY

OF

JUDY ROWE

ON BEHALF OF

AMERENUE

CASE NO. EC-2002-112

St. Louis, Missouri
May 2002

1 **REBUTTAL TESTIMONY**

2 **OF**

3 **JUDY ROWE**

4 **ON BEHALF OF**

5 **AMERENUE**

6 **CASE NO. EC-2002-112**

7 **Q. Please state your name and business address.**

8 A. Judy Rowe. 1901 Chouteau Avenue, St. Louis, Missouri 63103.

9 **Q. Please state your occupation and by whom you are employed.**

10 A. I am a credit representative for AmerenUE.

11 **Q. Please summarize your work experience for AmerenUE.**

12 A. I have worked for AmerenUE in several different positions for 25 years. For the
13 last two years or so, I have been a credit representative.

14 **Q. On whose behalf are you appearing in this proceeding?**

15 A. AmerenUE.

16 **Q. What is the purpose of your Rebuttal Testimony in this proceeding?**

17 A. I am testifying about the delivery of two notices to Sterling's Market on April 10,
18 2001.

19 **Q. What was your position with AmerenUE in the spring of 2001?**

20 A. Credit representative.

21 **Q. What were your duties at that time?**

22 A. Disconnecting residential and commercial accounts.

1 Q. Are you familiar with the grocery store which was located in the spring of
2 2001 at 8350 North Broadway in the City of St. Louis and known as Sterling's Market?

3 A. Yes.

4 Q. How are you familiar with Sterling's Market?

5 A. I passed it every day coming to and from work. I also delivered two envelopes
6 containing disconnect notices to Sterling's Market in April 2001.

7 Q. On what day did you deliver the notices?

8 A. April 10.

9 Q. Are Schedules 1 and 2 attached to your testimony the two disconnect notices
10 you delivered to Sterling's Market on April 10?

11 A. Yes.

12 Q. When did you arrive at the store to deliver the notices?

13 A. About 9:00 a.m.

14 Q. What did you observe when you arrived at the store?

15 A. There were several employees standing outside the store.

16 Q. Was the electricity on in the store when you arrived?

17 A. No.

18 Q. What did you do when you arrived at the store?

19 A. I told one of the people outside the store that I needed to talk to Sterling Moody or
20 someone from the office.

21 Q. What happened then?

22 A. I was taken to someone at one of the cash registers. A woman then came from the
23 back of the store and had me follow her to an office in the back of the store.

1 Q. Was anyone in the office?

2 A. Yes, there were two men in the office, one black and one white. The black man
3 was sitting at a desk. I understood the black man to be Sterling Moody and I told him I was
4 supposed to deliver the two envelopes to him. I then handed the envelopes to Mr. Moody.

5 Q. What did Mr. Moody do then?

6 A. He opened the envelopes and read the two notices. He then asked who he could
7 talk to in the office about the power being disconnected.

8 Q. What did you do then?

9 A. I went out to my car and radioed back to the office. I spoke to John McKenna and
10 told him that Mr. Moody wanted to talk to somebody.

11 Q. Did Mr. McKenna respond to what you told him?

12 A. Yes.

13 Q. What did you do then?

14 A. I went back into the store and told Mr. Moody he should call the name on the
15 disconnect notices I had given him.

16 Q. Did you leave the notices with Mr. Moody?

17 A. Yes.

18 Q. Did Mr. Moody read the notices in your presence?

19 A. Yes.

20 Q. Did Mr. Moody say anything else to you while you were in the office?

21 A. Mr. Moody asked if I could turn the power back on since I had my tools with me.

22 Q. What did you tell him?

1 A. I told him that I could not do it and that someone else would have 'to turn the
2 power back on.

3 Q. Why did you tell him that?

4 A. I told him that because I was not capable of turning the power back on because of
5 the type of meter he had at the store.

6 Q. How long were you at the store on April 10?

7 A. About 15 to 20 minutes.

8 Q. What did you do after leaving the store?

9 A. I went to my next call.

10 Q. In April 2001, was it your practice to keep a record of the different locations
11 where you did work on any given day?

12 A. Yes.

13 Q. Can you identify the document attached to your testimony as Schedule 3?

14 A. Schedule 3 is a copy of my route for April 10, 2001.

15 Q. What does this document show?

16 A. This document shows all of the different jobs that I was assigned to that day.

17 Q. Why is the 8350 North Broadway address handwritten at the top of Schedule
18 3 as opposed to all of the other addresses which are typed?

19 A. Because it wasn't a call assigned to me. I was given the envelopes to deliver to
20 Sterling's Market because I would be in the area of the store that day.

21 Q. Does this conclude your rebuttal testimony?

22 A. Yes.

23

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

STERLING MOODY, STERLING'S MARKET)
PLACE AND STERLING'S PLACE, I,)

Complainants,)

Case No. EC-2002-112

v.)

AMERENUE, UNION ELECTRIC CO. d/b/a)
AMERENUE, and MIKE FOY, LEROY ETTLING,)
and SHERRY MOSCHNER, as employees of)
AmerenUE,)

Respondents.)

AFFIDAVIT OF JUDY ROWE

STATE OF MISSOURI)

SS.

CITY OF ST. LOUIS)

Judy Rowe, being first duly sworn on his oath, states:

1. My name is Judy Rowe. I am employed by AmerenUE as a credit representative.

2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of AmerenUE consisting of pages 1 through 4, including Schedules 1 through 3, all of which testimony has been prepared in written form for introduction into evidence in Missouri Public Service Commission Case No. EC-2002-112 on behalf of AmerenUE.

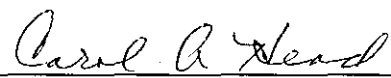
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.



Judy Rowe

Subscribed and sworn to before me this 29th day of May 2002.

CAROL A. HEAD
Notary Public - Notary Seal
STATE OF MISSOURI
St. Charles County
Commission Expires: Sept. 23, 2002



Notary Public

AmerenUE

One Ameren Plaza
1901 Chouteau Avenue
PO Box 66149
St. Louis, MO 63166-6149
314.621.3222

April 9, 2001

HAND DELIVERED

Sterlings Marketplace 1, Inc.
Attn: Sterling Moody
8350 N. Broadway
St. Louis, MO 63147

RE: Delinquent Balance \$113,574.36
due 3/16/01



FINAL NOTICE

Dear Mr. Moody:

This letter will serve as a final reminder to save you the inconvenience of being without service.

Please pay the amount shown above within 48 hours after receipt of this notice, otherwise, your service will be subject to disconnection without further notice, after April 11, 2001.

Sincerely,

L. Ettling
Sr. Credit Advisor
(314) 992-6788

ssm

Acct. #57300-01916

ROWE
SCHEDULE 1

AmerenUE

One Ameren Plaza
1901 Chouteau Avenue
PO Box 66149
St. Louis, MO 63166-6149
314.621.3222

April 9, 2001

PAID DELIVERED

Sterlings Marketplace 1, Inc.
Attn: Sterling Moody
8350 N. Broadway
St. Louis, MO 63147

RE: Delinquent Balance \$79,750.34
due 3/16/01



FINAL NOTICE

Dear Mr. Moody:

This letter will serve as a final reminder to save you the inconvenience of being without service.

Please pay the amount shown above within 48 hours after receipt of this notice, otherwise, your service will be subject to disconnection without further notice, after April 11, 2001.

Sincerely,

L. Ettlting
Sr. Credit Advisor
(314) 992-6788

ssm

Acct. #52300-02426

DISCONNECT ROUTE 04/10/01 07.11.14

ASSIGNED TO RT21

011000178	✓ 55 COM1 30 MIN	8630 N BROADWAY	cut sure	\$341.22 BAL \$404.64	MTR 21552424-0E	18 G13 /CUTC2 CO
011000192	✓ OTHER 30 MIN	700 CARRIE 2F RPO		\$25.00 BAL \$96.62	MTR 38025097-0	27 G16 /CUTR2
011000210	✓ OTHER 30 MIN	6118 N BROADWAY 2F RPO		\$25.00 BAL \$136.43	MTR 43644344-0E	27 G16 /CUTR2
011000217	✓ COM1 30 MIN	8228 N BROADWAY	cut sure	\$151.90 BAL \$162.53	MTR 39962451-OS	18 H14 /CUTC1
011000518	✓ OTHER 30 MIN	1628 VERONICA RPO		\$25.00 BAL \$185.70	MTR 18863793-BE	18 H13 /CUTR2
011000560	✓ OTHER 30 MIN	2570 COURTYARD PL RPO		\$223.15 BAL \$412.03	MTR 18232512-	03 P04 /CUTDE
011000795	✓ OTHER 30 MIN	9929 HOBBITS GLEN CT 3F APT F RPO		\$426.05 BAL \$483.63	MTR 52744612-0	17 J11 /CUTDE R1 CO
011000923	✓ OTHER 30 MIN	2420 TERRITORY CT 3F APT 33 RPO		\$167.04 BAL \$331.39	MTR 52737869-0	10 J10 /CUTDE
011002014	✓ OTHER 30 MIN	850, MCLARAN	POSTING	MTR#-80869458 CODE-80036. POSTING		18 H13 SC
011000181	✓ COM1 33 MIN	8854 N BROADWAY 1F		\$203.73 BAL \$260.92	MTR 69433977-0E	18 G12 /CUT2C1
011000209	✓ COM1 33 MIN	5038 N BROADWAY 1FR		\$828.73 BAL \$886.47	MTR 16264630-0E	27 R17 /CUT1C1
011000213	✓ COM1 33 MIN	8108 N BROADWAY 1F 2d		\$357.11 BAL \$478.30	MTR 40272051-F2	18 H14 /CUT2C1
011000216	✓ COM1 33 MIN	8212 N BROADWAY 1F		\$183.81 BAL \$257.60	MTR 43305180-0E	18 H14 /CUT0C1
011000218	✓ COM1 33 MIN	7807 HALL 2d		\$562.20 BAL \$1098.68	MTR 88652324-8	18 G14 /CUT0C1
011000481	✓ COM1 33 MIN	8960 RIVERVIEW DR	bypass	\$217.30 BAL \$256.32	MTR 72328509-	18 G12 /CUT0C1
011000510	✓ COM1 33 MIN	8733 RIVERVIEW 2FRN		\$25.00 BAL \$87.49	MTR 63530215-95	18 H13 /CUT1C1
011000631	✓ COM1 33 MIN	9924 HALLS FERRY RD		\$138.28 BAL \$195.73	MTR 17569119-0	10 I10 /CUT4C1

PRESS PF3 TO EXIT -- PF7/8 TO SCROLL UP/DOWN -- PF4 TO PRINT

DISCONNECT ROUTE 04/10/01 07.11.14

ASSIGNED TO RT21

011000694	2168 CHAMBERS RD	131.65				10 J10
COM1 33	MIN	\$131.65 BAL	\$194.11	MTR 28728337-0		/CUTOC1
011000786	10150 HALLS FERRY RD SUITE A					10 I10
COM1 33	MIN	\$283.85 BAL	\$401.53	MTR 52785873-0		/CUTOC1
011000207	4922 N BROADWAY					27 J10
RES1 34	MIN	\$30.00 BAL	\$208.32	MTR 9392142-EB		/CUTOC2
011000305	8326 HALLS FERRY RD 1F					18 H13
RES1 34	MIN	\$25.00 BAL	\$115.72	MTR 42780562-8F		/CUTOC2
011000554	1888 ANDROS CT					17 J11
RES1 34	MIN	\$237.43 BAL	\$345.37	MTR 88629374-0	ACCESS	/CUTOC2
011000573	1917 CHAMBERS RD					10 J10
RES1 34	MIN	\$158.22 BAL	\$232.44	MTR 68864614-0B		/CUTOC2

PRESS PF3 TO EXIT -- PF7/8 TO SCROLL UP/DOWN -- PF4 TO PRINT