

Exhibit No.:  
Issue: April 10, 2001 Disconnection  
of Service  
Witness: Ronaldo P. Parks  
Sponsoring Party: AmerenUE  
Type of Exhibit: Rebuttal Testimony  
Case No.: EC 2002-112  
Date Testimony Filed: May 31, 2002

# REBUTTAL TESTIMONY

OF

RONALDO P. PARKS

ON BEHALF OF

AMERENUE

CASE NO. EC-2002-112

St. Louis, Missouri  
May 2002

## 1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

1           A.     I helped prepare field assignments for members of our group as well as for an  
2 outside vendor. I also served as liaison between AmerenUE and customers to secure access to  
3 our equipment located on their property if not readily accessible.

4           **Q.     Are you familiar with the grocery store which was located at that time at**  
5 **8350 North Broadway in the City of St. Louis and known as Sterling's Market?**

6           A.     Yes, I am familiar with the name.

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

8           A.     Though I didn't know the exact location, I heard radio advertising. Also, in April  
9 of 2001, our group received a letter from Leroy Ettling, which he wanted delivered to Sterling's  
10 Market.

11          **Q.     When did you receive the envelope from Mr. Ettling?**

12          A.     Either the day before or the morning of the incident on April 10.

13          **Q.     What was your understanding as to what was in the envelope?**

14          A.     This was a scheduled disconnection letter from our Credit Department to a  
15 customer.

16          **Q.     What did you do upon receipt of the envelope?**

17          A.     I used the OAS format to create a field order

18          **Q.     What is an OAS field order?**

19          A.     This is a manual or computer generated field work order in the Outage Analysis  
20 System.

21          **Q.     What was your purpose in generating the OAS field order on Sterling's**  
22 **Market?**

1           A.     To enable the field rep carrying the letter to locate the precise address (using the  
2 meter number if necessary), and post comments on the account for future reference noting the  
3 letter had been delivered.

4           Q.     When did you generate the OAS field order?

5           A.     I did this on the morning the work order was scheduled for field action.

6           Q.     After you generated the OAS field order, what did you do with respect to the  
7 envelope you had received from Mr. Ettling?

8           A.     I gave the envelope to John McKenna who performed the final preparation of  
9 work assignments for field personnel in our group.

10          Q.     Did you have occasion later that same day, April 10, to discuss Sterling's  
11 Market with Mike Foy?

12          A.     Yes.

13          Q.     How did you happen to talk to Mr. Foy about Sterling's Market?

14          A.     Mr. Foy called me questioning our part in the disconnection of Sterling's Market  
15 earlier that morning.

16          Q.     Do you recall what time you had this discussion with Mr. Foy?

17          A.     Approximately mid morning.

18          Q.     What did you tell Mr. Foy during this conversation?

19          A.     I explained that it was not the intent of our group to issue a disconnection order  
20 for Sterling's Market that day. Instead, our role that morning was to deliver a letter indicating a  
21 pending disconnect order.

22          Q.     After talking to Mr. Foy, what, if anything, did you do?

23          A.     I back-tracked the steps I took to the generate the field order.

1 Q. Did you ultimately determine what happened that led to service being  
2 disconnected at Sterling's Market on April 10?

3 A. Yes.

4 Q. What did you determine had caused service to be disconnected at Sterling's  
5 Market on April 10?

6 A. To assign the letter from the Credit Department to a field person to deliver, I  
7 had accessed an OAS order entry screen for Sterling's Market. This would guarantee the field  
8 personnel went to the correct location and provide a comment line where they could note  
9 whether the letter was delivered and to whom. After completing the necessary fields, I pressed  
10 the ENTER key. A message appeared at the bottom of the screen asking for verification that all  
11 the information entered was correct. There wasn't anything unusual about this, so I pressed the  
12 ENTER key again to confirm. When done correctly, a message then appears at the bottom of the  
13 screen indicating a work order was successfully created. When I went back over my steps on  
14 April 10 to see what had happened, I realized that I didn't notice before pressing the ENTER key  
15 the second time that the routing assignment had defaulted the field order back to the trouble  
16 department. Because the field orders we generate are designated by a primary trouble code  
17 indicating electric service disconnection, the troubleman didn't question the request as it  
18 appeared on his job assignment screen.

19 Q. Was your intent in generating the OAS field order on April 10 to order a  
20 disconnect to occur on the same day at Sterling's Market?

21 A. No.

22 Q. Was it your intent to order a disconnect to occur at Sterling's Market on  
23 April 10?

1           A.     No.

2           Q.     Does this conclude your rebuttal testimony?

3           A.     Yes.

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

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

Complainants,

v.

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

Respondents.

Case No. EC-2002-112

**AFFIDAVIT OF RONALDO P. PARKS**

STATE OF MISSOURI

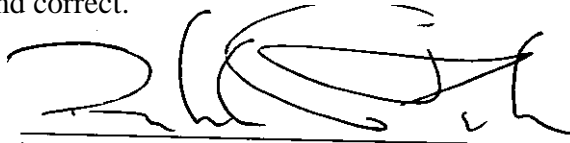
CITY OF ST. LOUIS

SS.


Ronaldo P. Parks, being first duly sworn on his oath, states:

1. My name is Ronaldo P. Parks. I am employed by AmerenUE as an Inspector in the Revenue Protection Department.
2. Attached hereto and made a part hereof for all purposes is my Rebuttal Testimony on behalf of AmerenUE consisting of pages 1 through 5, 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.

  
Ronaldo P. Parks

Subscribed and sworn to before me this 29<sup>th</sup> day of May 2002.

  
Notary Public

My commission expires: 9-23-2002

