

Exhibit No.:  
Issue: April 17, 2001 Disconnection  
of Service  
Witness: Curtis Tunstall  
Sponsoring Party: AmerenUE  
Type of Exhibit: Rebuttal Testimony  
Case No.: EC 2002-112  
Date Testimony Filed: May 31, 2002

# REBUTTAL TESTIMONY

OF

CURTIS TUNSTALL

ON BEHALF OF

AMERENUE

CASE NO. EC-2002-112

St. Louis, Missouri  
May 2002

1 REBUTTAL TESTIMONY

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3 CURTIS TUNSTALL ;

4 ON BEHALF OF

5 AMERENUE

6 CASE NO. EC-2002-112

7 Q. Please state your name and business address.

8 A. Curtis Tunstall. My business address is 1901 Chouteau Avenue, St. Louis,  
9 Missouri 63103.

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

11 A. I am employed by AmerenUE as a power meterman.

12 Q. Please summarize your work experience and current duties and  
13 responsibilities for AmerenUE.

14 A. I have worked for AmerenUE/Union Electric Company for 28 years. I have  
15 worked in the building service area, in meter reading and in the meter department installing and  
16 wiring meters.

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

18 A. AmerenUE.

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

20 A. I am testifying about my attempt to disconnect electric service to Sterling's  
21 Market in April 2001.

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

1           A.     I have been a power meterman for about three years and I was a power meterman  
2 in the spring of 2001.

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

4           A.     As a power meterman, my duties include installing all types of meters, doing  
5 associated wiring and reconnecting and disconnecting service.

6           **Q.     Are you familiar with the grocery store which was located in the spring of**  
7 **2001 at 8350 North Broadway in the City of St. Louis and known as Sterling's Market?**

8           A.     Yes.

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

10          A.     I have been to that location more than once to disconnect electric service. I was  
11 last at the store to disconnect electric service on April 17, 2001.

12          **Q.     Why did you go to Sterling's Market on April 17?**

13          A.     I was dispatched to the store to disconnect electric service.

14          **Q.     Were you able to disconnect service on April 17 at that time?**

15          A.     No.

16          **Q.     What happened?**

17          A.     When I got to the store, I drove to the rear where the meters were. I put my  
18 ladder against the back wall of the building so I could get to the service wires. Using a clamp  
19 and an amp probe, I found that there was excess amperage in the lines. Because of the excessive  
20 amperage, I was not able to do the disconnect myself and determined that a trouble crew would  
21 be needed.

22          **Q.     What did you do then?**

1           A.     I went to the front of the store and asked the cashier if I could talk to the owner or  
2 manager of the store. I was taken through the store into a back office where there were two men.  
3 One man was black and the other was white. I told the two men in the office that I was there to  
4 disconnect the electricity. I explained to them that the electricity was being disconnected  
5 because the bills for electric service had not been paid.

6           Q.     Did either one say anything in response to what you said?

7           A.     The black man asked if I would give him a few hours until noon before I cut the  
8 service.

9                     Did you respond to his request?

10          A.     I told him I really had no discretion to delay cutting the service. However, I also  
11 told him that I would not be able to disconnect the service and that another AmerenUE worker  
12 would be coming to the store to do it later that day.

13          Q.     Did either man say anything else?

14          A.     After I told them why I was there, I heard the black man tell the other man that he  
15 had been waiting for the City to approve a grant so he would have money to pay the store's  
16 electric bill.

17          Q.     What did you do after you determined you were not able to disconnect  
18 service to the store?

19          A.     I radioed in to the dispatcher to send a trouble crew to take care of the  
20 disconnection.

21          Q.     Can you identify Schedule 1 to your testimony?

22          A.     Schedule 1 is a meter field report.

23          Q.     How was Schedule 1 prepared?

1           A.     Schedule 1 is a computer generated report which is how my field activity, and the  
2 activity of the different AmerenUE crews, is reported.

3           Q.     Are these reports prepared on a regular basis as the field work is done?

4           A.     Yes. Some information in the report is entered by the dispatcher. The field  
5 worker then fills in the report after the work is done so a record is made of the work.

6           Q.     What does Schedule 1 show with respect to Sterling's Market?

7           A.     Schedule 1 is a report of what I did at Sterling's Market on April 17, 2001. It  
8 reflects that I was dispatched to the store about 9:00 a.m. in the morning. It also shows that  
9 another AmerenUE worker, Darrell Cotton, was at the store that day after I left.

10          Q.     What time did you arrive at the store on April 17?

11          A.     I arrived at the store around 9:20 or 9:30. I think it was my first job that morning.

12          Q.     What time did you leave the store?

13          A.     About 30 minutes after I got there.

14          Q.     Did you wait for the trouble crew to arrive to disconnect service?

15          A.     No.

16          Q.     Were you at the store when service was disconnected later that day?

17          A.     No.

18          Q.     What time was it when you told the man in the store office that you were  
19 there to cut the electricity?

20          A.     It would have been around 9:45, after I arrived at the store and saw that I was not  
21 able to disconnect the service myself.

22          Q.     Does this conclude your rebuttal testimony?

23          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 CURTIS TUNSTALL**

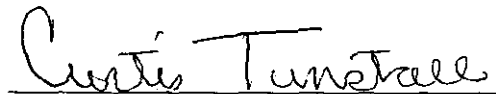
STATE OF MISSOURI

SS.

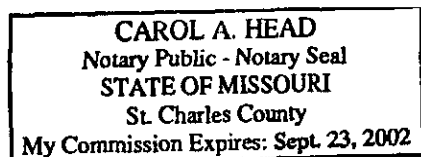
CITY OF ST. LOUIS


Curtis Tunstall, being first duly sworn on his oath, states:

1. My name is Curtis Tunstall. I am employed by AmerenUE as a power meterman.
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 Schedule 1, 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.

  
Curtis Tunstall

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



  
Notary Public

My commission expires: 9-23-2002

