

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

CHARLES HARTER,)	
)	
Complainant,)	
)	
vs.)	EC-2021-0285
)	
UNION ELECTRIC COMPANY)	
d/b/a Ameren Missouri,)	
)	
Respondent.)	

ANSWER

COMES NOW Union Electric Company d/b/a Ameren Missouri (henceforth referred to as “Ameren Missouri” or the "Company") who for its Answer states:

1. Paragraph 1 of the Complaint is not an allegation, and therefore, no response is required to that paragraph.

2. Ameren Missouri admits the allegation set forth in paragraph 2 of the Complaint.

3. Ameren Missouri admits the allegation set forth in paragraph 3 of the Complaint.

The listed post office box is one of the addresses which correspondence may be sent to Ameren Missouri.

4. Ameren Missouri admits the allegations set forth in paragraphs 4 and 5 of the Complaint.

5. Ameren Missouri admits paragraph 6 makes six requests but denies the allegations and denies that the Complainant is entitled to the relief requested.

6. Ameren Missouri admits that in paragraph 7 various state regulations are quoted, but the Company denies the allegations raised in paragraph 7 of the Complaint that it has violated a statute, tariff, or Commission regulation or order.

a. The Company denies the allegations in paragraph 7(a) of the Complaint.

Complainant's exhibits 2 and 7 (two disconnection letters Complainant alleges he received) omit the back-side of the letters.

b. The Company denies the allegations in paragraph 7(b) of the Complaint.

c. The Company denies the allegations in paragraph 7(c) of the Complaint to the extent that Complainant suggests the requirements of the cited Commission rule were met by Complainant.

d. The Company denies the allegations in paragraph 7(d) of the Complaint.

8. Ameren Missouri admits or denies the allegations raised in paragraph 8 of the Complaint as follows:

a. Ameren Missouri admits it has received calls from Complainant and Ameren Missouri customer advisors have spoken with Complainant, but the Company is without sufficient information as to what Complainant means by "many times" and "at length" and therefore denies the remaining allegations contained in paragraph 8(a) of the Complaint;

b. Ameren Missouri admits Complainant has made payments for electrical service received but denies these payments were sufficient as alleged in paragraph 8(b) of the Complaint;

c. Ameren Missouri admits Complainant has filed informal complaints with the Commission and that Complainant has called Ameren Missouri. On December 7, 2020, Ameren Missouri updated its response to the informal complaint with the date and times of two calls after an additional database was searched. Ameren Missouri otherwise denies the allegations contained in paragraph 8(c) of the Complaint.

d. Ameren Missouri admits Complainant has filed both informal and formal complaints with the Commission, and ** _____

_____ ** The Company otherwise denies the allegations contained in paragraph 8(d) of the Complaint.

9. Any allegation that is not specifically admitted by Ameren Missouri is denied.

AFFIRMATIVE DEFENSES

1. The Company's customer care advisors are available Monday through Friday from 7:00 a.m. to 7:00 p.m. Central for addressing customers' questions. The Company's interactive voice recorder ("IVR") system and website are also available during those hours and outside those hours to customers, which allow self-service options, including setting up payment agreements.

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2. **

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3. Complainant has failed to set forth a cause of action upon which relief can be granted. The Commission is a body created by statute with limited jurisdiction. The relief requested by Complainant would require the Commission to violate applicable statutes, regulations, orders, and tariffs.

4. Complainant has requested that the Commission provide a special dispensation that would allow him to enjoy privileges that are not afforded other customers who are similarly situated.

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WHEREFORE, Ameren Missouri requests that the Commission enter an order setting the matter of whether it has violated a statute, regulation, or order for hearing and grant any additional relief which it deems fit and proper.

Respectfully submitted,
BANKS LAW LLC

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CERTIFICATE OF SERVICE

I, Eric Kendall Banks, as counsel for Union Electric Company d/b/a Ameren Missouri, hereby certify that a copy of the foregoing Answer was filed with the Missouri Public Service Commission via EFIS. Copies have also been served electronically to the below parties at their respective email addresses on this 30th day of April, 2021.

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