

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

REBUTTAL TESTIMONY

OF

DARRELL COTTON

ON BEHALF OF

AMERENUE

CASE NO. EC-2002-112

St. Louis, Missouri
May 2002

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4 **OF**

5 **DARRELL COTTON**

6 **ON BEHALF OF**

7 **AMERENUE**

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

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

10 A. Darrell Cotton. 1901 Chouteau Avenue, St. Louis, Missouri 63103.

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

12 A. I am a troubleman for AmerenUE.

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

14 A. I have worked for AmerenUE for about fourteen years. My initial jobs for
15 AmerenUE were as a laborer and janitor and working in the storeroom. I became a lineman
16 about eight years ago and I became a troubleman about two years ago, in 2000.

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 going to testify about what I did at Sterling's Market in April 2001 to
21 disconnect electricity there.

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

23 A. Troubleman.

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

1 A. Basically to handle various types of trouble calls, such as light out calls and wire
2 down calls. I also disconnect and reconnect service as a troubleman.

3 Q. Are you familiar with the grocery store which was located in the spring of
4 2001 at 8350 North Broadway in the City of St. Louis and known as Sterling's Market?

5 A. Yes.

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

7 A. I disconnected electric service to the store on April 17, 2001. I had also been in
8 the store a few times so I was familiar with it before then.

9 Q. How was it that you disconnected power to the store on April 17?

10 A. Sometime around noon that day, I received a radio call from the dispatcher
11 ordering me to disconnect service.

12 Q. What time did you arrive at the store?

13 A. Around 1:00, after I finished lunch.

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

15 A. I went into the store and told one of the clerks that I was from AmerenUE and I
16 was there to disconnect the electricity. I was taken to an office in the back of the store where
17 there were two men, one black and one white.

18 Q. What happened next?

19 A. The black man introduced himself as Sterling Moody. When I told him why I
20 was there, Mr. Moody thanked me for telling him that. He said he was waiting on a call from
21 Jefferson City about getting some money to pay the bill. He asked me if I could hold off
22 disconnecting service for awhile.

23 Q. Did you delay cutting the electricity in response to his request?

1 A. Yes.

2 Q. How long?

3 A. About thirty minutes or so.

4 Q. What did you do during that thirty minutes?

5 A. I spent some of the time in the office and some of the time out by my truck.

6 Q. What happened at the end of the thirty minutes?

7 A. I went back into the store and back to the office and told Mr. Moody I was going

8 to have to cut the service.

9 Q. How did Mr. Moody respond?

10 A. He asked me to give him a few more minutes to clear the store and shut down his

11 compressors.

12 Q. What did you do?

13 A. I called my dispatcher to tell him that Mr. Moody wanted some more time.

Did you give Mr. Moody more time?

14 Q.15 A. Yes, I waited another forty five minutes or so.

16 Q. What did you do during this forty five minutes?

17 A. I spent most of the time in my truck which I had parked behind the store.

18 Q. What did you do when the forty five minutes were up?

19 A. I went back into the office through a rear entrance to the store and told Mr.

20 Moody I could not wait any longer, especially since my shift was close to ending.

21 Q. What did Mr. Moody say?

22 A. He told me to do what I had to do.

23 Q. What did you do then?

1 A. I disconnected service to the meter behind the store.

2 **Q. What did you do after disconnecting the service?**

3 A. I left in my truck.

4 **Q. About what time did you leave?**

5 A. Around 2:30.

6 **Q. So how much time passed between the time you arrived at the store to**

7 **disconnect the electricity and the time that you actually disconnected it?**

8 A. About ninety minutes.

9 **Q. Can you identify Schedule 1 to your testimony?**

10 A. Schedule 1 is a 62 screen, like a work order.

11 **Q. What is a 62 screen?**

12 A. A 62 screen is usually prepared by a dispatcher to show what needs to be done on

13 a job. The field workers fill out the rest of the screen on the computer to show what they did at

14 the job.

15 **Q. What does Schedule 1 show for Sterling's Market on April 17?**

16 A. It shows Curtis Tunstall, a meterman, was at the store before I was that morning.

17 It also shows when the computer has me dispatched there, what I did and when I logged out.

18 The disconnection I did is shown where it says "open primary switches" and the "DC"

19 completed.

20 **Q. Does this conclude your rebuttal testimony?**

21 A. Yes.

22

DSPLY 62 KEY

*** POAAS062 *** 29-62 TROUBLE ORDER DETAIL/COMPLETION *** 02106 16:40 ***

ORDER NO PL TP RECV DEVICE P SVC LT/PAD MNT ADDRESS
011072750 11 MJ 0747 X 01141120017 7 DG3 8350,N BROADWAY
FDR: 261005 WS HALL ST 3PN BADEN AV

SUB: BAD PSEUDONODE: MAP: S-11D SAINT LOUIS, MO
EST HRS: 0.0 EST RST TM: 0000 RMARKS: Y REL ORDR: CLM NO:

---DISP--- --ARRIVE-- ---CMPL--- ORIGINAL SVC: MG3 TRBL CDS: X? 70 MJ
ASGN TIME DATE TIME DATE TIME DATE CREW LEADER SZ GRID 18- G-13 TYP CONV
MM25 0855 041701 0000 000000 1008 041701 TUNSTALL 1 KVA 0 SIZE 0300
D340 1244 041701 0000 000000 1417 041701 COTTON, D 1 AFFTD 1 CALLS 1
ALERT 0 CBACK ST

WC: CS: CNTL: N CHG: \$0.00 COLL AMT: \$0.00 KWH: DISCONNECT:
AC --COMPONENT--- DMG COMPL REQD -----LOCATION/DETAILS-----
SVC DC @ THE PRIMARY SWITCHES
SVC DC OPEN PRIMARY SWITCHES

CUST: STERLINGS MARKET PLACE 1, BY: E17061 PH: 314 383 3211
DISPR: C25484 RMK: MTR#-70593313 (E-3PH-KWH/DEMAND).CUT SERVICE
RESTORE 1417 041701 RECV 0747 041701 PRNTD 1019 091101
MTR 70593313 RDG CODE KWH/D LOC 0
STAT RE MTR RDG CODE LOC METER FIELD ACTION
PF1=HELP PF2=TOP PF3=MAIN MENU PF5=STICKY PF7/8=UP/DOWN PF12=JUMP

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 DARRELL COTTON

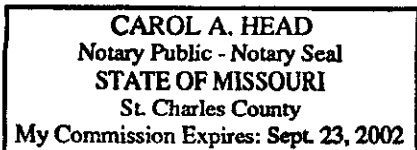
STATE OF MISSOURI)
SS.
CITY OF ST. LOUIS)

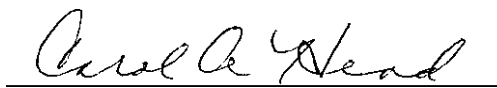
Darrell Cotton, being first duly sworn on his oath, states:

1. My name is Darrell Cotton. I am employed by AmerenUE as a troubleman.
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.


Darrell Cotton

Subscribed and sworn to before me this 3rd day of May 2002.




Notary Public