

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

Raymond Joseph Freeman, III,)	
)	
Complainant,)	
)	<u>Case No. EC-2009-0048</u>
v.)	
)	
Union Electric Company,)	
d/b/a AmerenUE,)	
)	
Respondent.)	

**MOTION FOR THE COMMISSION TO ISSUE ORDER TO SHOW CAUSE OR
IN THE ALTERNATIVE TO SET A DATE FOR HEARING**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through counsel, and submits a Motion for the Commission to Issue Order to Show Cause or in the Alternative to Set a Date for Hearing as follows:

1. On August 15, 2008, Raymond Joseph Freeman, III (Mr. Freeman or Complainant), filed a formal complaint with the Missouri Public Service Commission (Commission) against Union Electric Company, d/b/a AmerenUE (AmerenUE or Company).

2. In his complaint, Mr. Freeman asserts several allegations against AmerenUE concerning the disconnection of his services and the methods by which AmerenUE structures its rates.

3. On August 19, 2008 the Commission ordered a *Notice of Complaint and Order Directing Staff Investigation*, directing Staff to file a report of investigation no later than October 8, 2008.

4. On September 18, 2008, AmerenUE filed *an Answer and Motion To Dismiss*, denying any wrongdoing under Missouri law or Commission rules and requesting that the Commission issue an order dismissing the complaint.

5. On October 7, 2008, Staff filed its *Report of Staff Investigation* in which Staff reported that Mr. Freeman has not alleged any violations of Missouri statute, Commission rules, or AmerenUE's tariff, and that Staff is unable to find any violations thereof.

WHEREFORE, Staff recommends the Commission issue an Order directing Mr. Freeman to show cause why his complaint should not be dismissed, or in the alternative to issue an Order setting a date for an evidentiary hearing in this matter.

Respectfully submitted,

/s/ Eric Dearmont

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 5th day of January, 2009.

/s/ Eric Dearmont