

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

Brian White,)	
)	
Complainant,)	
)	
vs.)	Case No. EC-2010-0276
Union Electric Company, d/b/a)	
AmerenUE,)	
Respondent.)	

ANSWER

COMES NOW Union Electric Company d/b/a AmerenUE (AmerenUE or Company), and for its Answer to the Complaint filed in this proceeding, states as follows:

1. On April 6, 2010, Brian White (“Complainant”), with mailing address of 8534 Litzsinger Rd., Brentwood, Missouri 63144, initiated this proceeding by filing a Complaint against AmerenUE (“the Company” or “AmerenUE”).
2. Any allegation not specifically admitted herein by the Company should be considered to be denied.
3. In paragraph 1 of his Complaint, Complainant alleges that AmerenUE, with a P.O. Box of 66700, St. Louis, MO, is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri. AmerenUE admits these allegations but clarifies that its mailing address for payments is P.O. Box 66529, St. Louis, Missouri 66529.
4. In paragraph 2 of his Complaint, Complainant alleges that until August 2009 he paid all AmerenUE bills “without issue.” AmerenUE is without sufficient information to form a belief as to these allegations and therefore denies the same, but in further answer does admit that it has no record of any prior dispute lodged by Complainant regarding his account for electric service at the 8534 Litzsinger Road address.
5. Complainant also alleges in paragraph 2 that in August 2009 he received a bill with an additional charge of \$****.** added as an “Elec. Adjusted Serv. Amt” and that there was no additional explanation for the charge. AmerenUE admits that it sent said bill and that there was no express explanation for the charge on that bill. In further answer, however,

AmerenUE states that its business practice is to send a standard form letter of explanation along with such corrected bills.

6. In paragraph 3 of the Complaint, Complainant alleges that he called AmerenUE and was told the charge was for a switched meter. AmerenUE admits this allegation.

7. Complainant also alleges in paragraph 3 that he has lived in the residence for over five years, has had the same meter, and that it has never been switched. AmerenUE states that Complainant has been billed for electric service at the 8534 Litzsinger Road address for more than five years and based on this information AmerenUE admits that Complainant has lived in the residence for five years. AmerenUE also admits that the same meter has been physically located at Complainant's residence and has been measuring electrical service there for over five years. AmerenUE denies the remaining allegations of paragraph 3.

8. In further answer, AmerenUE states that a "switched" meter refers to a situation where, due to a data entry error when two new accounts are established at the same time, *information* transmitted by one meter from the physical address where that meter is located is switched in AmerenUE's billing system with *information* transmitted by a second (different) meter from the second meter's physical address, such that the customer at the first address is billed based on information related to electric service at the second address, and vice versa. In this case, at and since the time of the initial meter installation at Complainant's address, on April 15, 2004, Complainant has been billed for electric service provided to, and metered at, another residence whose meter was also installed on that date, and the customer at that residence has likewise been billed for service to Complainant. This error was not discovered until the customer at the second address lodged an inquiry, on August 5, 2009. Once the error was discovered, AmerenUE determined the amount by which it had overbilled the second customer due to the switched meter, refunded amounts due to that customer, and sent a corrected bill to Complainant in the amount by which it had underbilled Complainant (limited to the twelve monthly billing periods preceding the discovery).

9. In numbers 2 and 3 of Complainant's requests for relief, Complainant requests "a better, detailed explanation of what [he] owe[s] and why" and "a month by month detail of what was billed and what was paid." AmerenUE states that a number of employees, including several customer service representatives and two customer service leaders, provided this information verbally to Complainant. The information was also provided to Complainant in writing, in the

form of the spreadsheets attached hereto as Exhibits A and B, which were mailed to Complainant on or about April 12, 2010. As a result, these requests for relief are moot.

10. In his request for relief number 1 Complainant requests that he not be charged “for the switched meter.” In further answer, AmerenUE states that Complainant has been properly charged for that amount of electric service provided to Complainant but for which Complainant was previously underbilled due to the switched meter, such charge being limited, in accordance with the provisions of AmerenUE’s electric tariff provisions regarding undercharges for residential electric service, to the twelve monthly billing periods calculated from the date AmerenUE received an inquiry about a possible switched meter and discovered the error.

11. The following attorneys should be served with all pleadings in this case:

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WHEREFORE, AmerenUE respectfully requests that the Commission issue an order denying as moot Complainant’s requests for relief numbered 2 and 3 in Complainant’s Complaint, denying Complainant’s request for relief number 1 in Complainant’s Complaint, and affirming that AmerenUE has properly billed Complainant in the amount of \$ ****. ** for undercharges for residential electric service; or, in the alternative, that the Commission set the matter for hearing.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Answer was served on the following parties via electronic mail (e-mail) or via regular mail on this 7th day of May, 2010.

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/s/ Sarah E. Giboney
Sarah E. Giboney

EC-2010-0276
EXHIBIT A
HAS BEEN MARKED
HIGHLY CONFIDENTIAL

EC-2010-0276

EXHIBIT B

HAS BEEN MARKED

HIGHLY CONFIDENTIAL