

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

John T. and Victoria Finch,)	
)	
Complainants,)	
)	
v.)	Case No. EC-2004-0411
)	
Union Electric Company,)	
d/b/a AmerenUE,)	
)	
Respondent.)	

ANSWER OF UNION ELECTRIC COMPANY AND MOTION TO DISMISS

COMES NOW Union Electric Company d/b/a AmerenUE ("AmerenUE" or "Company") and for its Answer to the Complaint filed herein and its Motion to Dismiss hereby states as follows:

1. On February 18, 2004 John T. and Victoria Finch filed a Complaint in this proceeding against AmerenUE. The Complaint includes several attached documents explaining the Complainants' allegations against the Company. These documents indicate that John T. and Victoria Finch are husband and wife, who reside at 1027 Hughes Drive, Imperial, Missouri. They allege that on or about September 10, 2003, AmerenUE sent the Complainants a bill for service that included an \$1,800.70 "Reinstatement Amount" for service rendered during the period from 1993-1995 to Mr. Finch and his ex-wife Rhonda (Bishop) Finch at two separate addresses in O'Fallon, Missouri.
2. The attachments to the Complaint allege that Victoria Finch is not and should not be responsible for the previous bill for service provided to Mr. Finch and/or

his ex-wife in O'Fallon, Missouri. In addition, they indicate that Mr. Finch is not and should not be responsible for any portion of the "Reinstatement Amount" which relates to service provided after Mr. Finch had moved to a separate address, in February, 1995.

3. The Complaint seeks two forms of relief. First, it asks that AmerenUE provide "concrete proof" that John T. Finch is the responsible party for the past due amount. Second, it requests that the account of Victoria Finch be separated from the debt owed by John T. and Rhonda Finch.

4. AmerenUE has already provided the relief that the Complainants are seeking and therefore this Complaint should be dismissed. The Company has eliminated the disputed bill from the account of John T. and Victoria Finch at 1027 Hughes Drive, Imperial, Missouri. The Company agrees that Victoria Finch was not responsible for the disputed bill and her service should not be affected thereby. The Company has also reviewed the \$1,800.70 disputed amount based on the evidence Mr. Finch has provided that he did not reside at the address where service was rendered after February 1995 (even though the account remained in his name thereafter). Based on this review, AmerenUE has reduced the amount owed to \$631.66, the account balance as of February 22, 1995. The Company is providing to the Complainants and has provided to the Staff evidence from the Company's records, demonstrating that amount was the balance in the account as of that date. The Company has established a separate non-metered account in the name of John T. Finch that will be billed for this amount. The balance in this separate account will not impact the service or billing for the metered account of John T. and Victoria Finch.

WHEREFORE, for the reasons stated herein, AmerenUE respectfully requests that the Commission accept AmerenUE's answer and grant its motion to dismiss this complaint.

Respectfully submitted,

By:




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Dated: March 22, 2004

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and copy of the foregoing *Answer and Motion to Dismiss* was served on all parties of record via United States first-class mail, postage pre-paid, or by electronic mail (e-mail) on this 22nd day of March, 2004.



Thomas M. Byrne