

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

Craig Mershon,

Complainant,

v.

Union Electric Company d/b/a  
Ameren Missouri,

Respondent.

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**Case No. EC-2013-0521**

**STAFF RESPONSE TO  
RECOMMENDED REPORT AND ORDER**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through the undersigned counsel, and for its *Response to Recommended Report and Order* respectfully states as follows:

1. On March 24, 2014, the regulatory law judge assigned to this case issued his recommended report and order (the “recommended R&O”). Staff does not object to the ultimate findings, conclusions, or result reached by the recommended R&O; however, Staff has noticed a few places in the recommended R&O which it believes warrant correction or clarification before or when the order is finally approved.

2. First, the following sentence appears near the middle of page 18: “Therefore, the Commission concludes that **Mr. Mershon** did not violate that regulation.” (Emphasis added) Staff suggests that this reference to “Mr. Mershon” was intended to refer to “Ameren” and should be corrected to reflect that “Ameren did not violate that regulation.”

3. Next, the following sentence appears near the middle of page 20: “Moreover, in *Ameren Missouri’s Motion for Reconsideration or for Amended Order*, Ameren argues that no other amount is ‘disputed’ under the Commission’s regulations disconnection pending this report and order’s effective date.” Staff respectfully suggests that something is missing from the foregoing sentence, although Staff is not entirely certain as to what is missing. Perhaps inserting the word “regarding” between the words “regulations” and “disconnection” would accomplish what was intended; perhaps not. However, Staff respectfully suggests that this should be clarified.

4. Finally, two minor spelling errors appear on page 4. Counsel for Ameren’s first name is misspelled as “Sara” instead of “Sarah,” and counsel for Staff’s last name is misspelled as “Keevel” instead of “Keevil.”

**WHEREFORE**, Staff respectfully submits this *Response* to the recommended report and order and requests that the foregoing matters be corrected / clarified before or when the order is finally approved.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

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### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all parties of record this 27<sup>th</sup> day of March, 2014.

**/s/ Jeffrey A. Keevil**