

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

Marlyn Young,	)	
	)	
Complainant,	)	
	)	
v.	)	
	)	Case No. EC-2006-0283
Union Electric Company, d/b/a	)	
AmerenUE,	)	
	)	
Respondent.	)	

**STAFF REPLY TO MARLYN YOUNG'S**

**"OBJECTION AND RESPONSE TO DISMISSAL OF COMPLIANT AGAINST  
AMEREN UNION ELECTRIC"**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its Reply, states as follows:

1. On March 24, 2006, the Staff filed its *Staff Report* (Report) concerning its investigation of Marlyn Young's complaint against Union Electric Company, d/b/a Ameren UE, in accordance with the Commission's February 6, 2006 *Order Directing Staff To Investigate And File A Report*.
2. On March 27, 2006, the Commission issued its *Order Directing Complainant to File Response* by April 17, 2006, "...setting forth the reasons the Complaint should not be dismissed." On April 24, 2006, Mr. Young's "*Objection And Response To Dismissal Of Compliant Against Ameren Union Electric*" (Objection And Response) was filed with the Commission.

3. On April 28, 2006, the Commission issued its *Order Directing Reply To Complainant's Response* (Order Directing Reply) stating "The parties may file a reply to Complainant's response by May 4, 2006."

4. The Staff has conducted an analysis of the 12 points enumerated in Mr. Young's Objection And Response. Staff's Reply to each of Mr. Young's 12 items are contained in its "Staff Reply To Objection And Response Of Marlyn Young", attached hereto as Exhibit A and incorporated by reference herein. Because Staff's Reply involves specific personal information about the Complainant, the attached Reply is filed as highly confidential (HC) in accordance with Commission rule 4 CSR 240-2.070 (10) .<sup>1</sup> For the reasons stated in Staff's Reply, the Staff renews its original Report recommendation that the Commission dismiss this Complaint.

WHEREFORE, pursuant to the Commission's Order Directing Reply, the Staff submits its Reply to Mr. Young's Objection And Response; and, for the reasons stated in Staff's Reply, the Staff renews its Report recommendation that the Commission dismiss this Complaint.

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<sup>1</sup> 4 CSR 240-2.070 (10) states in pertinent part "The investigative report shall not be made public unless released in accordance with sections 386.480, 392.210(2) or 393.140(3), RSMo, or during the course of the hearing involving the complaint."

Respectfully submitted,

**/s/ Robert S. Berlin**

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Missouri Bar No. 51709

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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 counsel of record this 2nd day of May 2006.

**/s/ Robert S. Berlin**

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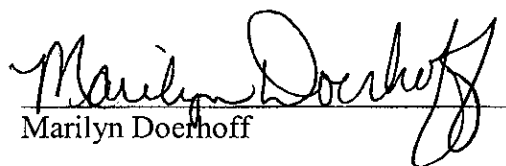
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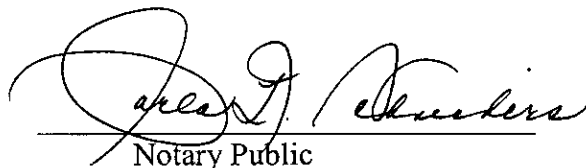
**AFFIDAVIT OF MARILYN DOERHOFF**

**STATE OF MISSOURI**     )  
                                      ) ss  
**COUNTY OF COLE**        )

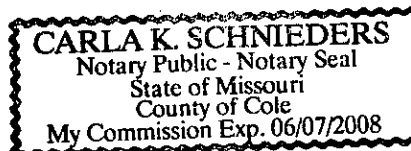
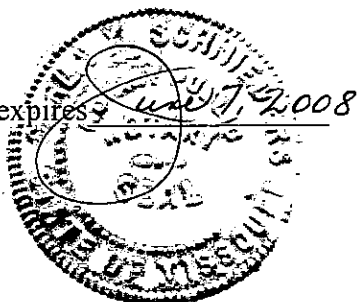
Marilyn Doerhoff, of lawful age, on oath states that she has participated in the preparation of the foregoing Staff's Reply to Objection and Response of Marlyn Young, and that such matters are true and correct to the best of her knowledge and belief.

  
Marilyn Doerhoff

Subscribed and sworn to before me this 2nd day of May, 2006.

  
Notary Public

My commission expires 06/07/2008



**“Exhibit A” has been  
deemed  
HIGHLY  
CONFIDENTIAL  
in its entirety.**