

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

Doug Geno and	)	
Nancy Geno,	)	
Complainants,	)	
	)	
vs.	)	Case No. EC-2009-0400
	)	
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 May 7, 2009, Doug and Nancy Geno of 6554 Dolphin Circle, Florissant, MO 63033 (Complainants) initiated this proceeding by filing a Complaint against AmerenUE.

2. Any allegation not specifically admitted herein by the Company should be deemed denied.

3. In paragraph 1 of the Complaint, Complainants allege that AmerenUE is located in St. Louis, Missouri, and that AmerenUE is a public utility under the jurisdiction and supervision of the Public Service Commission of the State of Missouri. AmerenUE admits the allegations contained in paragraph 1 of the Complaint.

4. In paragraph 2 of the Complaint, Complainants state that on February 14, 2009 they had a power surge come through their home and also their neighbor's home, Jim Ryan of 6550 Dolphin Circle. Complainants were not home at the time of this surge. Jim Ryan was home at the time of the surge and called AmerenUE. Complainants state that the AmerenUE worker told Mr. Ryan he needed to call an electrician. When the electrician came, he called

AmerenUE back out because he said the homes were still not safe. Complainant states that the second AmerenUE worker that came out ran a line from the tri-pod at the common ground as a temporary fix.

5. AmerenUE admits there was an electrical issue at 6550 and 6554 Dolphin Circle on February 14, 2009. The issue was an underground neutral cable fault which was in the middle of the Complainants' driveway under asphalt. A temporary cable was installed by an AmerenUE employee to provide a neutral connection until the existing cable could be replaced with newly bored cable and conduit. The Company denies that the homes were left unsafe by the AmerenUE employee.

6. The gang meter base, which feeds both customers at 6550 and 6554 Dolphin Circle, is required by electrical code to have a grounding wire attached to a grounding rod. Complainants had neither. If this required ground had been on the meter base, the complained of damages would not have occurred.

6. As part of paragraph 3 of their Complaint, Complainants include several attachments: The first is a letter dated March 31, 2009 to the Chairman, President and CEO of AmerenUE from Mr. & Mrs. Douglas Geno. This letter details the February 14, 2009 electrical incident and Complainants actions and conversations since the incident. Complainant states "[t]he initial problem resulted in 220V flowing to the 110V electrical outlets in both homes simultaneously, thus destroying several thousands of dollars worth of our property and equipment." Also included in that letter is a list of the costs to replace the equipment that was damaged during the incident along with restaurant charges to date. The Company denies that the alleged damages were caused by any fault, negligence, or lack of care by AmerenUE. Further,

the alleged damages would have been prevented if the meter base had been set up with the required grounding wire and rod.

8. The second attachment included for paragraph 3 is a February 19, 2009 letter from The Hartford Property & Casualty Insurance Company to Douglas & Nancy Geno. The letter informed Complainants that certain claims were being denied. The Company is without sufficient information to either admit or deny any of the information contained in the February 19, 2009 letter.

10. The last attachment included for paragraph 3 is a letter from Corporate Claims Management, Inc., who is a third party administrator that handles liability claims on behalf of AmerenUE, to Nancy Geno. The letter states that Corporate Claims Management, Inc. denied Ms. Geno's claim of loss because no negligence or lack of care on the part of AmerenUE was found. Also attached to this letter is Union Electric Company tariff Sheet No. 138. AmerenUE believes these attachments to be accurate.

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

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WHEREFORE, because there has been no violation of any statute, tariff, rule, or Commission Order on the part of AmerenUE to cause these damages to Complainant and

because Complainants meter base did not comply with electrical code requirements, AmerenUE respectfully requests the Commission issue an order dismissing this Complaint or, in the alternative, set the matter for hearing.

Respectfully submitted,

**SMITH LEWIS, LLP**

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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 10<sup>th</sup> day of June, 2009.

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