

FILED

JUN 03 2008

CURRENTLY BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

Missouri Public
Service Commission

PETER B. HOWARD
Relator/Complainant,

v.

UNION ELECTRIC CO. d/b/a
AmerenUE
Respondent.


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) Cause No. EC-2008-0329
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COMPLAINANT'S ANSWER TO RESPONDENT'S ANSWER

COMES NOW Relator, Peter B. Howard and avers the following:

1. In paragraph three of Respondent's answer, AmerenUE alleges that it has not overbilled relator for service at 4111 Maffitt ave., St. Louis, MO 63113. Complainant alleges that to be a lie.
2. Respondent alleges that they have not received any requests in their records from Complainant for billing records. Complainant alleges that the company simply didn't record such requests.
3. Respondent asserts that it has made numerous attempts to change Complainant's meter at this residence. Complainant avers that the company has sent meter cards to that location, but no such requests for meter removal have been made concerning the same.
4. At number six in Respondent's answer, the company asserts that Complainant did not established service at this residence until June of 2005, therefore, he is not entitled to records dating back prior to this relevant time period. Although such allegations might bear credence, Complainant avers that he has kept the utility on at that location since 1998, when his maternal uncle (Herbert L. Thomas) passed, who was the last user of record at that residence. Since that time, Complainant has housed his animals at that location and maintains service there to tend to their rudimentary needs. Therefore pursuant to 4CSR 240-2.135, Complainant respectfully request this agency subpoena the billing statements from the last ten (10) years for the restricted purpose of this formal inquiry and that such records not be made available to the general public.
5. At number seven (7) of its answer, Respondent implies that the last "good reading" it received at 4111 Maffitt was on July 23rd, 2006. Enclosed, Complainant has provided a copy of an "actual reading" and payment for \$29.11 of said reading from 08/21-09/05 2005. Additionally, the billing statement provides us with payment of \$28.56 from the previous month's usage.

6. At number 12 in its answer, Respondent makes the erroneous averment that the dwelling is heated by electricity and in the winter would likely show and increase even if the dwelling is unoccupied. Duhhhhhhhhhhhhh????????????????? Complainant is without sufficient esoteric information to answer the Respondent's asinine propositions and therefore leaves Respondent to proving the same. Additionally, Complainant has contested each and every inflated bill sent by Respondent concerning this uninhabited dwelling.
7. Additionally, Respondent has sent Complainant a disconnection notice concerning this dwelling (a copy of which is enclosed) if full payment is not rendered on or before June 9th, 2008. Complainant is confused, as he was informed by your agency that the administrative rules of engagement prohibit such action (except for future delinquencies) for contested amounts until such matters are finalized.


Peter B. Howard (Complainant)

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NOTICE: DISCONNECTED UNLESS THE AMOUNT DUE OF \$674.14

PETER B HOWARD
4111 MAFFITT AVE
SAINT LOUIS MO 63113

AMEREN
PO BOX 66700
SAINT LOUIS MO 63166-6700

Customer Number

Service To Date

07125

APR 22, 2008

\$674.14

5020000 0043871071205 00674140 00674140 00674140

NOTICE

IMPORTANT - PLEASE READ THIS IMMEDIATELY

YOUR UTILITY SERVICE AT

4111 MAFFITT
SAINT LOUIS MO 63113

will be disconnected unless the amount due is paid on or before the day we receive payment or the next business day.

WILL BE DISCONNECTED UNLESS THE AMOUNT DUE OF \$674.14 IS PAID ON OR BEFORE JUN 09, 2008
FOR THE REASON(S) MARKED BELOW

☒ Past Due Balance ☐ Deposit Due

Account Number

43871-07125

Service to Date

APR 22, 2008

Last Payment

\$90.00

Was Received on

APR 28, 2008

NOTICE:

If the amount due shown above has not been paid by the date indicated, your service is subject to disconnection. If your service is disconnected, you will be required to pay the full amount due plus a reconnection charge before service can be restored. Should your service be disconnected, we will try to restore your service on the day we receive payment or the next business day.

If you cannot pay the above amount, it may be possible to arrange a payment plan. Please call our Customer Contact Center during regular business hours of 7 a.m. to 7 p.m., Monday through Friday at 314-206-1234. For customers using Relay, dial 711.

IF PAYMENT OF THIS ACCOUNT HAS BEEN MADE, PLEASE DISREGARD THIS NOTICE. THANK YOU.

 **Ameren UE**
PO BOX 66700
SAINT LOUIS MO 63166-6700
314-206-1234

AmerenUE P.O. BOX 66529 ST. LOUIS, MO 63166-6529

PRES RDG	PREV RDG	USE	READING	RATE	AMOUNT
65271	65000	271	ACTUAL	1M	27.95
					1.16
St. Louis City Muni Chg					\$29.11
AMOUNT DUE ON 10/04					

99 B-000034225
Auto 5-Digit

FIRST CLASS MAIL
U.S. POSTAGE
PAID 1 OUNCE
ST. LOUIS, MO
PERMIT NO. 2859

Service at: 4111 MAFFITT
Service from 08/21 to 09/20/05 Days 30
Last Payment 08/25/05 \$28.56
Acct. No. 43871-07125 Bill Date 09/22/2005

ST. LOUIS SUPERMARKET #3

TERMINAL ID: M00002
TELLER: 1
September 26, 2005 12:28 PM

AmerenUE
TRANSH 6.1 SER# 1634 TSH 924

ACT# 4387107125

AMOUNT PAID \$29.11

CASH \$29.11

**RECEIPT NUMBER:
2690500061291105**

If you must call for reconnection
or to complete your transaction,
please have your receipt number ready.
Metropolitan St. Louis call 314-344-1111
Outside the Metropolitan area call
1-800-222-7863

TRANSACTION SERVICE FEE

THANK YOU
AMERICAN PAYMENT SYSTEMS