

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

Charles Harter,

Complainant,

v.

Union Electric Company d/b/a
Ameren Missouri,

Respondent.

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File No. EC-2013-0491

LIST OF ISSUES, LIST OF WITNESSES, AND ORDER OF CROSS EXAMINATION

COMES NOW Staff of the Missouri Public Service Commission ("Staff"), by and through the undersigned counsel, and on behalf of Staff, the Complainant, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and the Office of the Public Counsel ("OPC"), known together herein as the "Parties", files this *List of Issues, List of Witnesses, and Order of Cross Examination* with the Missouri Public Service Commission ("Commission") and states as follows:

1. On August 30, 2013,¹ the Commission directed the parties to file a List of Issues, List of Witnesses, and Order of Cross Examination by September 11. This filing complies with the Commission's Order.

2. The Parties hereto agree that the following issues are before the Commission for decision:

- a. Whether the January 21, 2013 bill issued by Ameren Missouri to the Complainant and the information provided by Ameren Missouri regarding it violated any Commission statute, rule, order or approved Company tariff.

¹ All dates herein refer to calendar year 2013, unless otherwise specified.

- b. Whether Ameren Missouri violated any Commission statute, rule, order or approved Company tariff when Ameren Missouri removed Complainant from the cold weather rule payment arrangement.
- c. Whether Ameren Missouri violated any Commission statute, rule, order or approved Company tariff when Ameren Missouri refused to reinstate Complainant to the cold weather rule payment arrangement.
- d. Whether Ameren Missouri violated any Commission statute, rule, order or approved Company tariff when Ameren Missouri sent Complainant disconnection notices prior to his filing of the May 7, 2013 Complaint.
- e. Whether Ameren Missouri violated any Commission statute, rule, order or approved Company tariff when Ameren Missouri sent Complainant disconnection notices subsequent to his filing of the May 7, 2013 Complaint.

3. In regard to witnesses, the Complainant will call himself to testify, Staff will call Gay Fred, and Ameren Missouri will call Kathy Hart.

4. The Parties agree that the Complainant will present his case first, followed with cross-examination by OPC, Staff, and then Ameren Missouri. Staff will present its case second, followed with cross-examination by Ameren Missouri, OPC, and then the Complainant. Lastly, Ameren Missouri will present its case, followed with cross-examination by Staff, OPC, and then the Complainant.

WHEREFORE, Staff, on behalf of the Parties, files this *List of Issues, List of Witnesses, and Order of Cross Examination* as directed by the Commission in its *Second Order Amending Procedural Schedule* for its information and consideration.

Respectfully Submitted,

**STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION**

/s/Jennifer Hernandez

Jennifer Hernandez
Senior Staff Counsel
Missouri Bar No. 59814

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this **11th day of September 2013** by: United States Postal Mail, postage prepaid, to Charles Harter, 827 S. Sappington, St. Louis, MO 63126; electronically to Charles Harter at harleycharter@sbcglobal.net; electronically to Sarah E. Giboney, counsel for Ameren Missouri, at giboney@smithlewis.com; and electronically to the Office of the Public Counsel at opcservice@ded.mo.gov.