

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

**FILED  
August 16, 2007  
Data Center  
Missouri Public  
Service Commission**

MARLYN YOUNG

Complainant,

v.

UNION ELECTRIC d/b/a/  
AMEREN UE,

Respondent,

Case# EC-2007-0273

**MOTION FOR JUDGMENT AGAINST AMEREN UE**

COMES the Complainant and its Motion For Judgment against Ameren Union Electric to this Court as follows:

1. Respondent disconnect electric services of Complainant on October 16, 2006 at for failure to pay service charges from 8831 May Ave. St. Louis, MO.
2. Respondent just cause for termination of services to Complainant home was that PSC denied Complainant rehearing request on a prior formal complaint before the PSC dated December 2005.
3. Plaintiff file a Writ of Review in October 2006 in Circuit Court St. Louis County Missouri, which was remanded to Cole County Circuit Court in Missouri November 2006 which a determination is still pending.
4. Complainant filed a separate formal complaint before the PSC in January 2007.

5. Complainant was disputing service charges from another metering location and a improper service account number which was transferred to his service account at 2437 Wieck Dr. St. Louis, MO.
6. Complainant request Respondent to restore services at 2437 Wieck Dr. St. Louis, MO which was terminated on October 16, 2006 while disputing improper service charges to his account.
8. Respondent refuse to restore electric service to 2437 Wieck Dr. while Complainant was disputing charges with the Commission.
9. Complainant had to remove himself to another address, because he could not get electric service to his home which created health and safety issues, and a violation of municipal code to occupy the property in October 2006.
10. Respondent Ameren Union Electric attempted to disconnect Complainant's electric services in March 2007 at 211 Coburg Dr. St. Louis, MO, for service charges from another metering point while Complainant was disputing services charges.
11. Complainant had paid undisputed service charges in March 2007.
12. Complainant file a Motion For Contempt of Court.
13. Motion remained unanswered by Respondent.
14. Respondent attempted to disconnect Complainant electric service in June 2007.
15. Complainant had paid undisputed service charges for the month of June

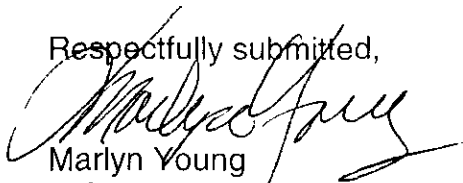
2007.

17. Complainant file a Motion For Contempt of Court.
18. Respondent did not reply or answer Motion For Contempt of Court.
19. It is the Complainant belief that Respondent violated RSMO. 386.570,
20. It is the Complainant belief that Respondent violated 4CSR 240-13.045(5)
21. Respondent tactic were to intimidate, and harass the Complainant
22. Respondent also display a wanton disrespect for the Complainant  
due process and Rule of Law.

WHEREFORE the Complainant demands that this Court issue and Order and  
Judgment against Respondent as follows:

- a. money judgment in the amount of \$2,000 for each (3)violation.
- b. and any other remedy the Court deems proper.

Respectfully submitted,



Marilyn Young  
P.O. Box 2487  
Florissant, MO 63033  
314.869.0799

**CERTIFICATION OF SERVICE**

I hereby certify the a true copy of the foregoing was sent the U.S. Mail on \_\_\_\_  
August 2007, to:

Ameren UE  
Thomas Byrne  
1901 Chouteau Avenue  
P.O. Box 66149(MC1310)  
St. Louis, MO 63166-6149

General Counsel's Office  
Kevin Thompson  
P.O. Box 360  
220 Madison St: Ste.800  
Jefferson City, MO 65102

Public Service Commission  
Data Center  
P.O. Box 360  
200 Madison St. Ste 800  
Jefferson City, MO 65102