

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

Dr. Jerry R. Eichholz,	)	
Complainant,	)	
	)	
vs.	)	Case No. EC-2008-0385
	)	
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 June 17, 2008, Dr. Jerry R. Eichholz of 12774 Partridge Run Drive, Florissant, MO 63033 (Complainant) 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, Complainant alleges that he is submitting a two-page letter to be considered as his formal complaint and request for investigation by the Missouri Public Service Commission (Commission). The Commission provided Notice of the Complaint to AmerenUE, which AmerenUE received on June 20, 2008.
4. In paragraph 2 of the Complaint, Complainant states that AmerenUE has fallen into a previous pattern of failing to adequately maintain its equipment and service lines in a manner to avoid power outages. Complainant alleges that he is experiencing

power outages more frequently and of a duration of two hours or more. Complainant also states that his neighbors are experiencing similar outages.

5. AmerenUE denies Complainant's allegations. First, AmerenUE submits that it adequately maintains its equipment and service lines. Further, as AmerenUE has committed to the Commission, it has taken several steps to improve the reliability of service for its customers. Finally, AmerenUE would note that the particular area in which Complainant resides is scheduled for two Power On Projects to convert overhead lines to underground.

6. AmerenUE acknowledges that Complainant has experienced a high number of outages recently. The specific outage history for the Complainant since March 2008 is as follows:

<u>Date</u>	<u>Reason for Outage</u>	<u>Restoration Time</u>
6/14/2008	Underground Equipment Malfunction	2 hours 31 minutes
6/03/2008	No Cause Found (thunderstorm)	Momentary
5/26/2008	Tree contact (rain)	Momentary
5/23/2008	No Cause Found	Momentary
5/13/2008	Tree contact (thunderstorm)	Momentary
5/11/2008	Tree Limb Broken (high winds & rain)	37 hours 41 minutes
4/30/2008	No Cause Found	3 hours 9 minutes
3/26/2008	Overhead Equipment Malfunction	Momentary
3/01/2008	No Cause Found	Momentary

As can be seen in the information above, there have been nine outages since March. Six of these outages were momentary, one was from a tree limb breaking from heavy winds during a major storm, there was no cause found for one and the other was due to a malfunction in equipment. There is a similar pattern of outages for Complainant's neighbors.

7. AmerenUE continues to work to resolve these issues. To limit the extent of outages along local power lines, in addition to the Company's new undergrounding conversion program, its expanded tree-trimming efforts, and its new comprehensive circuit inspection and repair program associated with Project Power On, the Company is installing "tap fuses." These devices help minimize the number of customer outages down the line in the case of fallen tree limbs or other weather-related damage. Similar to fuses or circuit breakers in the home, when a tap fuse operates or "trips," it interrupts power only to the specifically affected lines and allows power to continue to flow elsewhere.

8. In paragraph 3 of the Complaint, Complainant states that in recent months there had appeared to be a sincere effort on the part of AmerenUE to be concerned about customer service. AmerenUE agrees with this statement. The Company has taken several steps to improve its telephone system and the process of taking outage phone calls, tracking them, and following up with customers to make sure their service issues were resolved.

9. In paragraph 4 of the Complaint, Complainant alleges AmerenUE has gone back to unresponsive behavior as usual. The Company denies this allegation. AmerenUE has not ignored the Complainant's service concerns. The Company has tracked the outages for that area and has put that area on the schedule for two Power On Projects.

10. In paragraph 5, Complainant states that he placed a call on May 11, 2008 at approximately 6:45 p.m. to get a status update on his loss of service and got a recording stating that it would be some time before anyone would be able to talk with

him. AmerenUE cannot admit or deny this allegation because there is no record of the phone call on our system. Complainant must not have finished the process of going through the recording to notify the system of the outage at his residence.

11. In paragraph 6, Complainant again alleges unreliable service. As stated above, AmerenUE is concerned about the reliability of the service in Complainant's area (and on all areas of its system) and we are working to improve the system. Project Power On includes a Circuit Inspection and Repair Program that initiates an ongoing "foot patrol" program to help AmerenUE identify and repair or replace poles and other equipment before potential failures occur. It also includes the implementation of new technology to enable the Company to better evaluate the integrity of its distribution lines. Paragraph 6 also references Complainant's testimony at a local public hearing in Commission Case No. EO-2007-0037. The testimony was made part of the record in that case and recommendations were made by the Missouri Public Service Commission Staff in its Report regarding the Company's storm response. Several of these recommendations have already been put into place.

12. In paragraph 7, Complainant references authorizing an AmerenUE subcontractor to "trim and cut down trees as necessary to clear Ameren wires ..." on March 14, 2008. Complainant also alleges no such work has yet begun. AmerenUE cannot attest to the date that Complainant was told that the work would be done, but maintenance tree trimming on Complainant's feeder is in progress. Private property in the rear of Complainant's address has already been trimmed extensively. Attached as Attachment A are before and after pictures taken in June from the Paddock Forest area.

13. In paragraph 8, Complainant requests the Commission investigate and make recommendations to improve the reliability of AmerenUE's electrical service. AmerenUE believes that it is in the process of resolving Complainant's concerns and that further investigation is unnecessary.

14. In paragraph 9, Complainant states that AmerenUE's approach of first restoring service to the greatest number of customers needs to be reexamined. While AmerenUE believes restoring the greatest number of customers first is the correct policy to follow after a major storm event, it is implementing other measures which may help alleviate Complainant's concern. For example, as another part of Project Power On, AmerenUE is expanding its use of "automated switches." These are devices that automatically detect damage and switch around the damage location(s), thus restoring power to as many customers as possible even before the problem is fully diagnosed.

WHEREFORE, AmerenUE respectfully submits that it is taking the appropriate steps to address Complainant's concerns and improve the reliability of its system, and requests that the Commission issue an order dismissing this Complaint or, in the alternative, set the matter for hearing.

Dated: July 18, 2008

Respectfully submitted,

UNION ELECTRIC COMPANY,  
d/b/a AmerenUE

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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 18<sup>th</sup> day of July, 2008.

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/s/ Wendy K. Tatro

Wendy K. Tatro

# Attachment A







