

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

Robert B. Hector,	)	
Complainant,	)	
	)	
vs.	)	Case No. EC-2009-0112
	)	
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 September 24, 2008, Robert B. Hector of 3521 Imperial Hills Drive, Imperial, MO 63052 (Complainant) initiated this proceeding by filing a Complaint against AmerenUE.

2. Any allegation not specifically admitted by the Company should be considered to be denied.

3. In paragraph 1 of the Complaint, Complainant alleges 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, Complainant lists several allegations. AmerenUE admits or denies these allegations as follows:

A. (Bullets 1 and 2) AmerenUE has no independent knowledge as to whether or not Complainant or Complainant's son is disabled and so denies the same.

B. (Bullet 3) AmerenUE admits it has received letters from various medical doctors indicating that Complainant and Complainant's son use electrically operated medical equipment. While the medical letters indicate that not having electricity "could cause...medical difficulties," they do not indicate that the equipment is necessary to "sustain life." Other than these letters, AmerenUE does not have independent knowledge of this issue and so denies the same.

C. (Bullet 4) AmerenUE denies that Complainant has been enrolled in its Medical Registry<sup>1</sup>. AmerenUE's records show that Complainant has been sent paperwork to enroll in AmerenUE's Medical Registry several times (and at different addressees) and sent a follow up reminder each time, but it does not appear Complainant has ever returned the paperwork to complete the enrollment process.

D. (Bullets 5-9) AmerenUE admits that Complainant is the named account holder for service at 3521 Imperial Hills Drive. However, this account was not set up in February of 2008. Instead, in March of 2008 AmerenUE discovered service was being taken at this address but there was not a named account holder, so it sent out an "occupancy letter," which tells the occupant the electricity will be disconnected if service is not set up with the Company. After receiving the occupancy letter, Complainant contacted AmerenUE, set up service in his name and took responsibility for service from February 2008 forward.

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<sup>1</sup> AmerenUE's Medical Equipment Registry is a program that identifies customers who require electrically operated medical equipment. The program allows AmerenUE to notify customers in advance of a planned outage, allowing them to make other arrangements while the power is out. Depending upon what medical equipment is present, a customer may not be fully disconnected for non-payment and, instead, a 10 amp extender would be installed to allow the use of the medical equipment and a few other items such as a refrigerator or some lights.

E. (Bullet 6) AmerenUE denies Complainant's statement that a deposit was required because of Complainant choosing not to provide a social security number for his account at 3521 Imperial Hills Drive. Instead, a deposit was required because of Complainant's previous bankruptcy filing.

F. (Bullets 10-11) AmerenUE has no knowledge of whether or not a home health care worker contacted the Company and so denies the allegation. A disconnection notice for an overdue bill in the amount of \*\*[REDACTED]\*\* was sent to Complainant in May of 2008. A payment in the amount of \*\*[REDACTED]\*\* was posted on June 8, 2008, but the check was returned unpaid on June 12, 2008, because the check was written on a closed account.

G. (Bullets 12-13) AmerenUE admits that it did transfer bills from other addresses to his account. Complainant's ex-wife, Maria and her husband, Tim Wahlquist, filed an informal complaint at the Missouri Public Service Commission (MPSC) (informal complaint number C200602529). Mr. Wahlquist alleged that Complainant had set up service at another address (5446 Ambrose Crossing in Imperial) in his minor son's name. This account had been opened in the minor's name on April 21, 2005. AmerenUE transferred the bills to Complainant's name in 2005 based on this complaint.

Further review reveals a history of setting up accounts in other names and other social security numbers at various times. Service at 3258 Five Oaks Dr., Arnold, and 2356 Elm Dr., Arnold, were opened in Jennifer L. Hector's and Bryant R. Hector's names, respectfully. The social security number given for the account in Jennifer L. Hector's name belongs to a man in Nevada. The social security number given for the

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account in Bryant R. Hector's name belongs to a woman in Wisconsin. The Company later determined that these charges were discharged in a bankruptcy filing by Complainant and so removed the charges from Complainant's account. Service at 2146 Hillsboro Valley Park Rd., High Ridge, was placed in the name of Marlon Hector on September 10, 2006. The social security number provided to open this account belongs to a man in Wisconsin. A payment was made on this account by check for \$900.00, which was returned for insufficient funds. The check was written from a bank account in Robert Hector and Merlyn Hector's names. Further, Mr. Hector filed a complaint in the name Marlon Hector (C200708358) for the address 2146 Hillsboro Valley Park Rd., High Ridge. A social security number trace places Robert Hector at all of the above addresses.

H. (Bullets 14-21) Between March and September of 2008, the Company admits Complainant received bills and/or disconnect notices with various amount due, because of accounts being transferred (onto or off of Complainant's account) and because of payments being returned unpaid for insufficient funds. However, of the specific bill amounts listed, AmerenUE shows no bill or disconnection notice in the amounts of \*\*[REDACTED]\*\*, \*\*[REDACTED]\*\* or \*\*[REDACTED]\*\*. Additionally, AmerenUE's records do not show a bill of \*\*[REDACTED]\*\*, but does show one in the amount of \*\*[REDACTED]\*\*.

I. (Bullets 22-25) AmerenUE admits that Complainant has contacted the Company, usually after receiving disconnection notices, and our call center personnel have attempted to explain where the various account balances came from, sent out medical registry forms, and gave him the bankruptcy desk fax number so that the

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balances connected to his bankruptcy could be removed. Additionally, call center personnel explained how to send in medical letters requesting additional time to pay his bill due to his health.

J. (Bullets 26-27) AmerenUE admits Complainant was sent Medical Registry forms multiple times and his “pending status” was removed when he failed to return the forms as required.

K. (Bullets 28-30) AmerenUE admits receiving the referenced affidavit in the MPSC informal complaint C200602529. Part of that complaint was an allegation that Complainant was using his son’s social security number. AmerenUE denies that it ridiculed Complainant.

L. (Bullet 31) AmerenUE has no knowledge of the truth of any of Complainant’s allegations regarding Maria or Timothy Wahlquist, and therefore denies the same.

M. (Bullets 31-34) AmerenUE denies refusing any pledges from energy assistance organizations on behalf of Complainant. AmerenUE did receive a call from one energy assistance organization who stated that Complainant had not followed up or provided the information necessary to complete his assistance request. AmerenUE denies Complainant’s allegations of artificially inflating bills or that there was gross misconduct by the Company. AmerenUE has no knowledge of any agency alleging AmerenUE violated the rules of Dollar More. AmerenUE has received approximately \$600 in assistance payments for Complainant’s account.

N. (Bullet 35) AmerenUE denies having any knowledge of Complainant talking with press or local television about this situation.

O. (Bullet 36) AmerenUE has no knowledge of the allegation that the Complainant requested the forms for a formal PSC complaint.

P. (Bullet 37) AmerenUE denies ridiculing or discriminating against Complainant. AmerenUE also denies telling any energy assistance agency that his application for assistance was fraudulent.

Q. (Bullets 38-39) AmerenUE denies that it has failed to provide information requested by Complainant.

5. AmerenUE recognizes that this Complaint is especially confusing due to the number of accounts involved, the number of names used to set up those accounts and the number of returned payments. However, AmerenUE wants to be clear, Complainant's service has not been disconnected and the Company has ceased its collection efforts while this Complaint is pending. Since the account at 3521 Imperial Hills Drive was opened, AmerenUE has received one payment and that payment was returned unpaid. In total, since 2005, AmerenUE has received a total of eight payments from Complainant on his various accounts and several of those payments were returned unpaid.

6. Currently, Complainant owes AmerenUE \*\*[REDACTED]\*\*. This amount includes current charges of \*\*[REDACTED]\*\*. There is an arrearage of \*\*[REDACTED]\*\* for this account. The remaining amounts are a deposit request for \*\*[REDACTED]\*\*, \*\*[REDACTED]\*\* for service at 2146 Hillsboro Valley Park Road in High Ridge between August 1, 2006 and October 10, 2007, \*\*[REDACTED]\*\* for service at 5446 Ambrose Crossing in Imperial between April 21, 2005 and May 1, 2006, \*\*[REDACTED]\*\* for service at the same Ambrose

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Crossing address between May 2, 2006 and September 5, 2006 and \*\*[REDACTED]\*\* for service at 1008 Cross Creek Drive between July 7, 2004 and March 29, 2005.

7. Complainant asks that the Commission set his balance due to zero. The Company respectfully submits that he has not provided a legitimate reason for the Commission to grant that request. While the Company wishes to be sensitive to Complainant and his son's disabilities, it does not feel it appropriate for its other customers to shoulder his bills.

WHEREFORE, AmerenUE respectfully requests that the Commission issue an order dismissing this Complaint or, in the alternative, set the matter for hearing.

Respectfully submitted,

UNION ELECTRIC COMPANY,  
d/b/a AmerenUE

By: /s/ Wendy K. Tatro  
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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 3rd day of November, 2008.

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*/s/ Wendy K. Tatro*

Wendy K. Tatro