

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

Lionell Harrold,)	
Complainant)	
)	
vs.)	Case No. EC-2008-0256
)	
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 February 4, 2008, Lionell Harrold of 11246 Marbella Drive, Apartment 2, St. Louis, MO 63138 (Complainant) initiated this proceeding by filing a Complaint against AmerenUE.

2. 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.

3. In paragraph 2 of the Complaint, Complainant states that a bill in the amount of \$2,091.83 for service provided at 1614 Burd, St. Louis, MO 63112, was improperly transferred to his account.

4. AmerenUE admits that the account at 1614 Burd, at one point, listed Lillian Haynes as the customer of record.

5. AmerenUE denies that the bill for 1614 Burd was improperly transferred to Complainant. The Company believes that Complainant resided at 1614 Burd, that he received the benefit of service and thus is responsible for the bill. AmerenUE had several

contacts with Complainant about service at 1614 Burd, indicating responsibility for the bill.

A. Complainant called on August 1, 2003 to advise that he was making a payment on the account.

B. Complainant called on November 25, 2003 requesting an extension on the time to make a payment on a bill.

C. On March 31, 2004, Complainant called to request the minimum payment due to prevent disconnection.

D. On January 19, 2005, Complainant called to request the bill be transferred into his name, as Ms. Haynes was deceased. The Company requested a copy of the death certificate or other proof of residence. This information was not provided at this time and the name on the account was not changed.

E. Complainant called AmerenUE to discuss the bill on March 3, 2005 and again on March 14, 2005.

F. On June 21, 2005 the Company received a copy of Ms. Haynes death certificate, indicating a date of death of November 18, 2003. At this time, the account balance was \$1,645.32. AmerenUE ran a social security trace, which placed Complainant at 1614 Burd as early as December of 1997 and which did not place him elsewhere between April of 2002 and May of 2006. AmerenUE then changed the customer of record to Complainant and transferred the \$1,645.32 balance to his account.

G. On August 24, 2005, the service was disconnected for nonpayment and a final bill was sent in the amount of \$2,091.83. This amount was for service after July 8, 2004.

6. When Complainant established service at 11246 Marbella Drive, Apartment 2, the outstanding amount owed from 1614 Burd, \$2,091.83, was transferred to his account. AmerenUE believes, based upon the information available to it, that this transfer was correct.

7. During discussions with Complainant after the \$2,091.83 was transferred to his account at 11246 Marbella Drive, Apartment 2, Complainant provided AmerenUE with a copy of his Missouri Nondriver License. This license shows 1614 Burd as his address, further adding to the belief that Complainant resided at this address and benefited from service at this residence. A copy of this license is attached as Exhibit A to this *Answer*.

8. Attached to the Complaint is a letter signed by a Mr. Lawrence Williams, which states the Complainant rented a room at 10122 Monarch Drive in St. Louis from November of 2003 through December of 2007. AmerenUE has attempted to investigate this allegation, but has not yet received a response to data requests that were sent to Complainant on February 12, 2008. At this point, AmerenUE does not believe this letter can be taken at face value. AmerenUE finds no record indicating that Mr. Williams is or ever was the owner of 10122 Monarch Drive during the time in question in this Complaint.

A. Mr. Williams has not been the customer of record for the Monarch Drive address. Records indicate the following names as the customers of record:

- Virgil Parker from February 12, 1991 – April 22, 2005.
- Tyrone Parker from April 22, 2005 – December 29, 2005.
- Tyzim Harold from February 3, 2006 – June 26, 2006.
- Tyrone Parker from July 13, 2006 – March 8, 2007.
- Top Real Estate from June 28, 2007 – December 21, 2007.
- Sarita Hopkins from December 21, 2007 – current.

B. The St. Louis County assessor's website, which can be found at <http://revenue.stlouisco.com/ias/>,¹ lists the last four owners of the property (2003 - 2008) as Virgil Parker, Tyrone Parker, Top Real Estate Professional, Inc. and Salena Watson. Screen prints for the years 2003 through 2008 are attached as Exhibit B.

C. The phone number listed on the letter for Mr. Williams is the same as the contact number for an account at 5965 Lalite, St. Louis, MO 63136. The customer of record for 5965 Lalite is Patricia Harrold. AmerenUE does not know if Ms. Harrold is related to Complainant, but notes that the last name is spelled somewhat uniquely and is spelled the same as the Complainant.

9. AmerenUE believes that it has at all times acted properly and that the transfer of \$2,091.83 to the Complainant's account at 11246 Marbella Drive, Apartment 2, was appropriate.

¹ A locator ID search (on bottom left of screen) using 11F411042 will pull up the current property owner of 10122 Monarch and a drop down box on the left side of the screen allows a review of previous owners back through 2001.

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
Steven R. Sullivan, # 33102
Sr. Vice President, General
Counsel and Secretary
Wendy K. Tatro, # 60261
Managing Assoc. General Counsel
Ameren Services Company
P.O. Box 66149
St. Louis, MO 63166-6149
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ssullivan@ameren.com
wtatro@ameren.com

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 10th day of March, 2008.

General Counsel Office
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
GenCounsel@psc.mo.gov

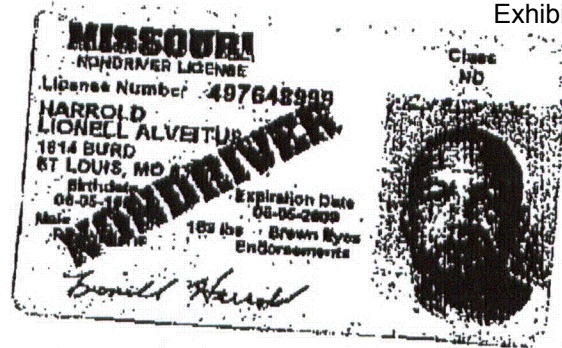
Lewis Mills
Office Of Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

Lionell Harrold
11246 Marbella Drive
Apartment 2
St. Louis, MO 63138

/s/ Wendy K. Tatro

Wendy K. Tatro

Exhibit A



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**Residential
Available Tax Years**

2003 ▾

Available Cards:

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Ownership / Legal Information

Locator ID 11F411042	Tax Year 2003	Tax District 128JJ	City Code 000	Site Code 0095	Destination
Owner:		Parker Virgil			
Taxing Address:		10122 Monarch Dr Saint Louis, MO 63136			
Care-Of Name:					
Mailing Address:		Same as taxing address.			
Sub. Book & Page:					
Assessor's Book & Page:		03 0165 L			
City Code - Name:		000 - Unincorporated		Trash District No.	
Subdivision:		Hathaway Manor No 8			
Legal Description:					
Roll - Frame:		12257 2236			
Lot No.		805		Block No.	
Lot Dimensions:		0060/ 0100/		Acres:	
Recorder's Date & Daily:		1999082500732		Deed Type:	
Taxing Code:		A - Taxable		Land Use Code:	
Deed Information:		Locator Deed Search Information			

Note: The information on this site is refreshed bi-weekly. The last refresh occurred on 3/2**Assessment Information**

CURRENT	Appraised				Assessec	
Tax Year: 2003	Land	Improv.	Total	%	Land	Improv
Residential:	8,200	52,100	60,300	19%	1,560	9,900
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	8,200	52,100	60,300		1,560	9,900

PREVIOUS	Appraised				Assessec	
Tax Year: 2002	Land	Improv.	Total	%	Land	Improv
Residential:	7,700	49,230	56,930	19%	1,460	9,350
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	7,700	49,230	56,930		1,460	9,350

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Residential Available Tax Years

2004 ▾

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Locator ID 11F411042	Tax Year 2004	Tax District 128JJ	City Code 000	Site Code 0095	Destina
Owner:		Parker Virgil			
Taxing Address:		10122 Monarch Dr Saint Louis, MO 63136			
Care-Of Name:					
Mailing Address:		Same as taxing address.			
Sub. Book & Page:					
Assessor's Book & Page:		03 0165 L			
City Code - Name:		000 - Unincorporated		Trash District No.	
Subdivision:		Hathaway Manor No 8			
Legal Description:					
Roll - Frame:		12257 2236			
Lot No.		805		Block No.	
Lot Dimensions:		0060/ 0100/		Acres:	
Recorder's Date & Daily:		1999082500732		Deed Type:	
Taxing Code:		A - Taxable		Land Use Code:	
Deed Information:		Locator Deed Search Information			

Note: The information on this site is refreshed bi-weekly. The last refresh occurred on 3/2**Assessment Information**

CURRENT	Appraised				Assessec	
Tax Year: 2004	Land	Improv.	Total	%	Land	Improv
Residential:	8,200	52,100	60,300	19%	1,560	9,900
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	8,200	52,100	60,300		1,560	9,900

PREVIOUS	Appraised				Assessec	
Tax Year: 2003	Land	Improv.	Total	%	Land	Improv
Residential:	8,200	52,100	60,300	19%	1,560	9,900
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	8,200	52,100	60,300		1,560	9,900

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**Residential
Available Tax Years**

2005 ▾

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Ownership / Legal Information					
Locator ID	Tax Year	Tax District	City Code	Site Code	Destination
11F411042	2005	128JJ	000	0095	
Owner:		Parker Virgil			
Taxing Address:		10122 Monarch Dr Saint Louis, MO 63136			
Care-Of Name:					
Mailing Address:		Same as taxing address.			
Sub. Book & Page:					
Assessor's Book & Page:		03 0165 L			
City Code - Name:		000 - Unincorporated		Trash District No.	
Subdivision:		Hathaway Manor No 8			
Legal Description:					
Roll - Frame:		12257 2236			
Lot No.		805		Block No.	
Lot Dimensions:		0060/ 0100/		Acres:	
Recorder's Date & Daily:		1999082500732		Deed Type:	
Taxing Code:		A - Taxable		Land Use Code:	
Deed Information:		Locator Deed Search Information			

Note: The information on this site is refreshed bi-weekly. The last refresh occurred on 3/2**Assessment Information**

CURRENT	Appraised				Assessec	
Tax Year: 2005	Land	Improv.	Total	%	Land	Improv
Residential:	9,900	54,400	64,300	19%	1,880	10,340
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	9,900	54,400	64,300		1,880	10,340

PREVIOUS	Appraised				Assessec	
Tax Year: 2004	Land	Improv.	Total	%	Land	Improv
Residential:	8,200	52,100	60,300	19%	1,560	9,900
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	8,200	52,100	60,300		1,560	9,900

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**Residential
Available Tax Years**

2006 ▾

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Ownership & Legal Information					
Locator ID	Tax Year	Tax District	City Code	Site Code	Destination
11F411042	2006	128JJ	000	0095	
Owner:		Parker Tyrone			
Taxing Address:		10122 Monarch Dr Saint Louis, MO 63136			
Care-Of Name:					
Mailing Address:		Same as taxing address.			
Sub. Book & Page:					
Assessor's Book & Page:		03 0165 L			
City Code - Name:		000 - Unincorporated		Trash District No.	
Subdivision:		Hathaway Manor No 8			
Legal Description:					
Roll - Frame:		17236 3498			
Lot No.		805		Block No.	
Lot Dimensions:		0060/ 0100/		Acres:	
Recorder's Date & Daily:		2006072400536		Deed Type:	
Taxing Code:		A - Taxable		Land Use Code:	
Deed Information:		Locator Deed Search Information			

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CURRENT	Appraised				Assessec	
Tax Year: 2006	Land	Improv.	Total	%	Land	Improv
Residential:	9,900	54,400	64,300	19%	1,880	10,340
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	9,900	54,400	64,300		1,880	10,340

PREVIOUS	Appraised				Assessec	
Tax Year: 2005	Land	Improv.	Total	%	Land	Improv
Residential:	9,900	54,400	64,300	19%	1,880	10,340
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	9,900	54,400	64,300		1,880	10,340

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**Residential
Available Tax Years**

2007 ▾

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Ownership / Legal Information

Locator ID	Tax Year	Tax District	City Code	Site Code	Destination
11F411042	2007	128JJ	000	0095	
Owner:		Top Real Estates Professionals Inc			
Taxing Address:		10122 Monarch Dr Saint Louis, MO 63136			
Care-Of Name:					
Mailing Address:		Same as taxing address.			
Sub. Book & Page:					
Assessor's Book & Page:		03 0165 L			
City Code - Name:		000 - Unincorporated		Trash District No.	
Subdivision:		Hathaway Manor No 8			
Legal Description:					
Roll - Frame:		17614 4649			
Lot No.		805		Block No.	
Lot Dimensions:		0060/ 0100/		Acres:	
Recorder's Date & Daily:		2007071700323		Deed Type:	
Taxing Code:		A - Taxable		Land Use Code:	
Deed Information:		Locator Deed Search Information			

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CURRENT	Appraised				Assessec	
Tax Year: 2007	Land	Improv.	Total	%	Land	Improv
Residential:	9,900	77,100	87,000	19%	1,880	14,650
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	9,900	77,100	87,000		1,880	14,650

PREVIOUS	Appraised				Assessec	
Tax Year: 2006	Land	Improv.	Total	%	Land	Improv
Residential:	9,900	54,400	64,300	19%	1,880	10,340
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	9,900	54,400	64,300		1,880	10,340

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2008 ▾

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Locator ID 11F411042	Tax Year 2008	Tax District 128JJ	City Code 000	Site Code 0095	Destina
Owner:		Watson Salena G			
Taxing Address:		10122 Monarch Dr Saint Louis, MO 63136			
Care-Of Name:					
Mailing Address:		Same as taxing address.			
Sub. Book & Page:					
Assessor's Book & Page:		03 0165 L			
City Code - Name:		000 - Unincorporated		Trash District No.	
Subdivision:		Hathaway Manor No 8			
Legal Description:					
Roll - Frame:		17766 2903			
Lot No.		805		Block No.	
Lot Dimensions:		0060/ 0100/		Acres:	
Recorder's Date & Daily:		2008011100519		Deed Type:	
Taxing Code:		A - Taxable		Land Use Code:	
Deed Information:		Locator Deed Search Information			

Note: The information on this site is refreshed bi-weekly. The last refresh occurred on 3/2**Assessment Information****Current assessment information will not be available until the end of May.**

PREVIOUS	Appraised				Assessec	
Tax Year: 2007	Land	Improv.	Total	%	Land	Improv
Residential:	9,900	77,100	87,000	19%	1,880	14,650
Agricultural:	0	0	0	12%	0	0
Commercial:	0	0	0	32%	0	0
Total:	9,900	77,100	87,000		1,880	14,650

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