

August 29, 2002

VIA FEDERAL EXPRESS



Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED³

AUG 30 2002

Missouri Public
Service Commission

Re: Case No. EC-2003-0044
Terry M. Talley v. Union Electric d/b/a AmerenUE

Dear Mr. Roberts:

Enclosed for filing on behalf of Union Electric Company, d/b/a AmerenUE, in the above matter, please find an original and eight (8) copies of its **Answer to the Complaint** in this matter.

Kindly acknowledge receipt of this filing by stamping a copy of the enclosed letter and returning it to me in the enclosed self-addressed envelope.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Cook", is written over the typed name and title.

James J. Cook
Managing Associate General Counsel

JJC/cjs
Enclosures

cc: Parties on Attached Service List

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³

AUG 30 2002

Missouri Public
Service Commission

Terry Talley,)
)
Complainant,)
)
vs.)
) Case No. EC-2003-0044
AmerenUE,)
)
Respondent.)

**ANSWER OF UNION ELECTRIC COMPANY,
d/b/a AMERENUE TO COMPLAINT**

Comes now Union Electric Company, d/b/a AmerenUE, ("Respondent"), by counsel, and submits this pleading in response to the Complaint filed by Terry Talley, in accordance with instructions outlined in the Notice of Complaint, dated August 12, 2002, from the Missouri Public Service Commission ("Commission"):

1. Terry Talley filed a complaint with the Commission on August 8, 2002, inquiring about billing practices, and disputing charges associated with electric services provided by Respondent for Account No. 88032-18114 (previously 0660-077-8200-75) for the period of May 1, 2002 to June 2, 2002.¹

1. Complainant's meter is transmitting Automatic Meter Readings (AMR) data regularly and the bills for this account are based on these transmitted readings.

2. After receiving an inquiry from Complainant, Respondent had the Complainant's meter (M/N 52667389) manually read on July 25, 2002. The reported reading was 46128, which falls between the two AMR readings transmitted as 46124 on

¹ Complainant's account number was changed from 13 digits to 10 digits with the conversion of Respondent's new Customer One computer system on May 5, 2002.

July 24, 2002, and 46143 on July 25, 2002. Therefore, Respondent believes that accurate data is being transmitted.

3. A review of Complainant's account shows that Complainant used 923 kWh during the May 1, 2002 – June 2, 2002 billing period in question. Comparing that usage to previous months at this address indicates that there is no significant variation in usage that would justify a Complaint.

4. For comparable months in previous years, the following usages were recorded: 1999 – 824 kWh; 2000 – 747 kWh; 2001 – 694 kWh. Moreover, usage for this account exceeded 900 kWh in 10 other billing periods since January, 1999, and exceeded 800 kWh in an additional 7 billing periods.

5. Ameren denies that it has billed this account incorrectly, denies that its meter readings are inaccurate and denies that it has, in any way, charged Complainant inaccurately.

WHEREFORE, Union Electric Company, d/b/a AmerenUE requests this Complaint be dismissed, since the Respondent's action were at all time lawful and proper.

Dated: August 29, 2002

Respectfully submitted, ..

Union Electric Company, d/b/a/ AmerenUE

By: 

James J. Cook, MBE #22697

Ameren Services Company

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CERTIFICATE OF SERVICE

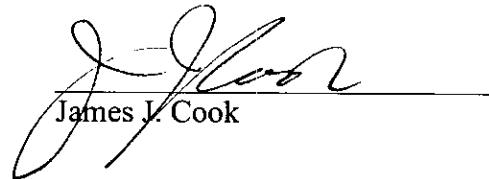
I hereby certify that a copy of the foregoing was served via U.S. first-class mail on this 29th day of August, 2002, on the following parties of record:

CASE NO. EC-2003-0044

Office of the Public Counsel
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Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
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Jefferson City, MO 65102

Terry M. Talley
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James J. Cook