

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

John B. Jackson,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. EC-2006-0002
	)	
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 July 5, 2005, John B. Jackson of 4954 Kemper Avenue, 2E, St. Louis, Missouri, (“Complainant”) initiated this proceeding by filing a Complaint against AmerenUE.
2. In paragraph 1 of the Complaint, Complainant alleges that AmerenUE is located at One Ameren Plaza, 1901 Chouteau Avenue, and that AmerenUE is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri. AmerenUE admits the allegations contained in paragraph 1 of the Complaint. AmerenUE notes that the above-referenced address is in St. Louis, Missouri.
3. In paragraph 2 of the Complaint, the Complainant alleges that AmerenUE has “fail[ed] to define [the] monetary amount or percentage if any” that he is legally responsible for. Complainant also alleges that unspecified disputed charges are still in question.
4. In his request for relief, Complainant requests an itemized statement showing the true amount he is legally responsible for.

5. In his request for relief, the Complainant requests that AmerenUE provide an itemized statement showing true amount he is legally responsible for.

6. AmerenUE denies the allegation that it has failed to define the monetary amount that Complainant owes for his electric bill. AmerenUE has provided the Complainant with an itemized bill that includes an unpaid amount from a previous address where the Complainant resided. A copy of Complainant's current bill, as well as related previous bills are attached hereto as a highly confidential Exhibit A. AmerenUE also denies that there are any charges that are the subject of any legitimate dispute. Finally, AmerenUE notes that the only relief requested by the Complainant, an itemized statement showing the true amount he is legally responsible for, has been provided.

WHEREFORE AmerenUE respectfully requests that the Commission issue an order dismissing this Complaint. In the alternative, AmerenUE requests that it issue an order requiring its Staff to conduct an independent investigation of this Complaint, and to file a report of its findings with the Commission.

Respectfully submitted,

By: /s/ Thomas M. Byrne

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Dated: August 8, 2005

### **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 8<sup>th</sup> day of August, 2005.

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*/s/ Thomas M. Byrne*

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Thomas M. Byrne