

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

Brett Felber,)	
)	
Complainant,)	
)	
v.)	<u>File No. EC-2024-0217</u>
)	
Union Electric Company d/b/a Ameren Missouri,)	
)	
Respondent.)	

ANSWER

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), by and through the undersigned counsel, and for its *Answer* to the Complaint filed by Complainant respectfully states to the Missouri Public Service Commission ("Commission"):

1. Ameren Missouri is without sufficient information, knowledge or belief to answer whether Complainant resides at the address in Paragraph 1, and therefore denies the same.
2. Ameren Missouri admits that it provides electric service to the address referenced in Paragraph 2a.
3. Ameren Missouri admits its physical address is 1901 Chouteau Avenue, St. Louis, Missouri, 63103, as stated in Paragraph 3.
4. Ameren Missouri admits it is a public utility under the jurisdiction of the Missouri Public Service Commission, as stated in Paragraph 4.
5. Ameren Missouri denies the allegation of the amount in dispute in Paragraph 5.
6. Ameren Missouri admits that Complainant made *** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] *** Ameren Missouri

denies all other allegations in Paragraph 6.

7. Ameren Missouri denies all allegations in Paragraph 7.

8. Ameren Missouri is without sufficient information, knowledge or belief to answer whether Complainant has filed a charge of discrimination against Ameren Missouri, and therefore denies the same. Ameren Missouri denies all other allegations in Paragraph 8.

9. Attachment 1 to the Complaint appears to be a two-page form titled "Charge of Discrimination" and is illegible. To the extent an answer is required for the attachment, Ameren Missouri denies all allegations contained therein.

10. Attachment 2 to the Complaint appears to be a summary of the Complainant's allegations against Ameren Missouri. To the extent an answer is required for the attachment, Ameren Missouri denies all allegations contained therein.

11. To the extent an answer is required for Attachment 3 to the Complaint, Ameren Missouri admits it contains accurate copies of the bills Ameren Missouri issued for service to Complainant.

Grounds of Defense

12. *** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ***

13. *** [REDACTED]

[REDACTED]

[REDACTED] ***

14. *** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ***

15. All service locations have an assigned meter bill group, which determines the scheduled meter read date for billing purposes. These meter bill groups are generally assigned by physical location, which was done historically to accommodate the routes of actual "meter readers" who went out monthly to read meters for billing purposes (pre-automated meter read technology).

*** [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] ***

16. *** [REDACTED]

[REDACTED] *** The Commission is a regulatory body of limited jurisdiction having only such powers as are conferred by statute and cannot order damages or grant equitable relief. *See e.g., State ex. rel. GS Technologies Operating Co., Inc. v. Public Service Comm'n*, 116 S.W.3d 680, 695 (Mo. App. 2003); *American Petroleum Exchange v. Public Service Comm'n*, 172 S.W.2d 952, 956 (Mo. 1943). *** [REDACTED]

[REDACTED] *** are not within the Commission's authority to grant.

WHEREFORE, Ameren Missouri requests the Commission set this matter for hearing as to whether the Company violated any Commission statute, rule, order or approved tariff and deny Complainant's request for relief.

Respectfully submitted,

/s/Jennifer L. Hernandez

Jennifer L. Hernandez, MO Bar #59814

Corporate Counsel

1901 Chouteau Avenue, MC 1310

P.O. Box 66149

St. Louis, MO 63166-6149

(314) 978-8418 (Telephone)

(314) 554-4014 (Facsimile)

AmerenMOService@ameren.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 23rd day of February 2024.

/s/Jennifer L. Hernandez

Jennifer L. Hernandez