

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

|                         |   |                       |
|-------------------------|---|-----------------------|
| Damon Andersson,        | ) |                       |
|                         | ) |                       |
| Complainant,            | ) |                       |
|                         | ) |                       |
| v.                      | ) | Case No. EC-2005-0398 |
|                         | ) |                       |
| Union Electric Company, | ) |                       |
| d/b/a AmerenUE,         | ) |                       |
|                         | ) |                       |
| Respondent.             | ) |                       |

**ANSWER OF AMERENUE**

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 May 3, 2005, Damon Andersson of 1 El Perro Drive, St. Peters, Missouri (“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 alleges that he is not responsible for Ericka Walters’ bill. The Company’s records indicate that a balance of \$1,362.06 was recently transferred to the Complainant’s account from two previous addresses:
  - a. The first address was 111 E. Pitman Street, O’Fallon, Missouri, and the balance transferred from that address was incurred from the period November 10, 2000

through February 29, 2002. The final bill for that address was \$795.20. Company records indicate that the Complainant was the customer of record at that address. In addition, the owner of the property confirmed that Complainant was the tenant at this location during the relevant period. Complainant unquestionably is responsible for this portion of his bill and he apparently is not disputing this portion of his bill.

- b. The second address was 25 Woodgate Village, St. Charles, Missouri, and the balance transferred from that address was incurred from the period October 16, 2003, through September 2, 2004. The final bill for that address was \$566.86. Although this account was listed in the name of Ericka Walters, Complainant has admitted he resided at that address during the time the bill was incurred.

- 4. 4 CSR 240-13.050(2)(D) provides in relevant part:

(2) None of the following shall constitute sufficient cause for a utility to discontinue service:

...

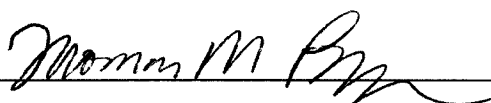
(D) The failure to pay the bill of another customer, unless the customer whose service is sought to be discontinued received substantial benefit and use of the service;

(Emphasis added.)

In this case, the Complainant admittedly resided at 25 Woodgate Village, St. Charles, Missouri during the period when the bill at issue in this proceeding was incurred. The Complainant received substantial benefit from the service AmerenUE provided at that address, and therefore he should be held responsible for the bill for that service.

WHEREFORE, AmerenUE respectfully requests that the Commission issue its order dismissing this Complaint and finding that the Complainant is responsible for the disputed bill. In the alternative, AmerenUE requests that the Commission schedule a hearing in this proceeding.

Respectfully submitted,

By: 

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Dated: May 31, 2005

## CERTIFICATE OF SERVICE

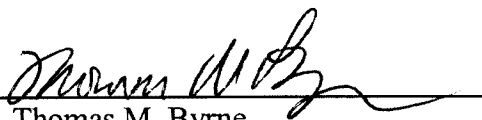
The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 31<sup>st</sup> day of May, 2005.

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