

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

<b>Ryan P. Dooley,</b>	)	
	)	
<b>Complainant,</b>	)	
	)	<b><u>File No.: EC-2025-0093</u></b>
<b>vs.</b>	)	
	)	
<b>Union Electric Company, d/b/a</b>	)	
<b>Ameren Missouri,</b>	)	
	)	
<b>Respondent.</b>	)	

**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 \*\* [REDACTED] [REDACTED] \*\* as referenced in paragraph 2a.
3. Paragraph 3 of the Complaint contains no allegations, and therefore, no response is required.
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 allegations contained in paragraph 5.

6. Paragraph 6 contains Complainant's request for relief, to which no response is required. To the extent any of Complainant's request in paragraph 6 contains allegations, Ameren Missouri denies the same.
7. Regarding paragraph 7 of the Complaint, Ameren Missouri denies that it has violated any statute, tariff, or Commission regulation or order.
8. Ameren Missouri admits that Complainant \*\* [REDACTED] [REDACTED] [REDACTED] \*\* Ameren Missouri is without sufficient information, knowledge or belief to answer the remaining allegations contained in paragraph 8, and therefore denies the same.

#### Grounds for Defense

1. The complainant \*\* [REDACTED] [REDACTED] \*\*
2. 20 CSR 4240-13.030 governs the conditions under which Ameren Missouri may require a deposit as a condition of continuing or re-establishing residential service.
3. \*\* [REDACTED] [REDACTED] [REDACTED] \*\* This is in accordance with 20 CSR 4240-13.030 and MO.P.S.C. Schedule No. 6 Sheet No. 139 A.2.a. of Ameren Missouri's General Rules and Regulations – Deposit Practices.
4. Ameren Missouri's Commission-approved tariffs have the force and effect of law. See e.g., State ex rel. Missouri Gas Energy v. Public Service Commission, 210 S.W.3d 330, 337 (Mo. App. W.D. 2006).

5. The Commission is a regulatory body of limited jurisdiction having only such powers as are conferred by statute, and cannot require a refund, 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).

**WHEREFORE**, the Company respectfully requests that the Commission set the matter of whether the Company has violated a statute, tariff, Commission regulation or Commission order, for hearing.

Respectfully submitted,

/s/ *Carla Fields Johnson*

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**Attorneys for Union Electric  
Company d/b/a Ameren Missouri**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served on the parties on the certified service list via electronic mail and via U.S. Mail to Ryan P. Dooley

\*\* [REDACTED] \*\* on this 30<sup>th</sup> day of October 2024.

/s/ *Carla Fields Johnson*