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314.554.2237 314.554.4014 (fax) jcook@ameren.com

April 18, 2002

FEDERAL EXPRESS

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street, Suite 100
Jefferson City, MO 65101

Re:

Larry and Veronica Herzing

Case No. EC-2002-409

Dear Mr. Roberts:

Enclosed for filing are an original and eight (8) copies of the Response filed on behalf of Union Electric Company, d/b/a AmerenUE, in the above case.

Please return a file-stamped copy of the filing letter in the enclosed self-addressed stamped envelope. If you have any questions or wish to further discuss this matter, I can be reached at (314) 554-2237.

Very truly yours,

James J. Cook Cook by cal

Managing Associate General Counsel

JJC/ch Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Larry and Veronica Herzing,)	
	Complainants,)	
VS.)	Case No. EC-2002-409
AmerenUE,)	Case No. EC-2002-409
	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 Larry and Veronica Herzing, in accordance with instructions outlined in the Notice of Complaint, dated March 20, 2002, from the Missouri Public Service Commission ("Commission"):

- 1. The Herzings filed a complaint with the Missouri Public Service Commission on March 6, 2002 disputing the transfer of balances of several unpaid accounts to their home account.
- 2. According to 4 CSR 240-13.050(2)(B) and Respondent's tariffs filed with the Missouri Public Service Commission, a utility may transfer and bill any unpaid balance to any other residential service account of the customer of comparable class of service.
- 3. Respondent followed its tariffs by transferring unpaid balances in accounts, which were in the name of Complainants, into other active accounts in the same name.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via U.S. first-class mail on this 18th day of April, 2002, on the following parties of record:

CASE NO. EC-2002-409

Office of the Public Counsel P. O. Box 7800 Jefferson City, MO 65102 General Counsel Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Larry and Veronica Herzing 193 East Center Holts Summit, MO 65043