

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

Jill C. Beatty,	)	
	)	
Complainant,	)	
	)	
vs.	)	Case No. EC-2010-0142
	)	
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 November 5, 2009, Jill C. Beatty with mailing address of P.O. Box 1562, Jefferson City, Missouri ("Complainant") initiated this proceeding by filing a Complaint against Union Electric Company, d/b/a AmerenUE ("the Company" or "AmerenUE").

2. Any allegation not specifically admitted herein by the Company should be considered to be denied.

3. 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.

4. In Paragraph 2 of the Complaint, Complainant states that she overpaid AmerenUE for electric service on August 28, 2009 in the amount of \$\*\*\*\*\*. Complainant later alleges that the amount she owed was \$\*\*\*\*\* but was denied a refund because her overpayment was too old. AmerenUE denies that Complainant made a \$\*\*\*\*\* payment on her electric account on August 28, 2009. But instead, a payment of \$\*\*\*\*\* was made on or about June 12, 2003 for a bill that was then due and payable. (*See* Complainant's attachments).

5. Complainant attached to her complaint a number of documents. These documents include: 1) an AmerenUE account print out; 2) an AmerenUE bill from June, 2003 in the amount of \$\*\*\*\*\*; 3) a Gerbes receipt dated June 12, 2003 in the amount of \$\*\*\*\*\*; 4) a notice of

disconnect dated November 10, 1997; and, 5) an AmerenUE bill for account number \*\*\*\*\* dated August 6, 2009 in the amount of \$\*\*\*\*\*. AmerenUE believes all of these documents are accurate except that it is without sufficient information to form a belief as to the truth of the June 12, 2003 Gerbes receipt.

6. AmerenUE offers a few points of clarification. By way of background, Complainant has an electric service account with AmerenUE. Service commenced for account number \*\*\*\*\* on or about May 7, 2003. When service under this account began \$\*\*\*\*\* was transferred in from account number \*. (service address: 2602 Midway Apt. B). This \$\*\*\*\*\* was a past due amount on a prior electric account in Complainant's name. Complainant was billed a then due and owing amount of \$\*\*\*\*\* on June 6, 2003. On or about June 13, 2003, Complainant made a payment to AmerenUE in the amount of \$\*\*\*\*\*. Then on or about June 16, 2003, Complainant stopped service for account number \*. Complainant opened and closed at least three other electric service accounts with AmerenUE before she started her current service for account number \*\*\*\*\* on or about November 28, 2008.

7. Complainant offers no evidence that she overpaid AmerenUE for electric service and AmerenUE denies this allegation.

8. Attached as Schedule 1HC to this Answer is a spreadsheet of account history for Complainant's accounts since May 13, 2003.

9. The following attorneys should be served with all pleadings in this case:

Alex R. Knoll, #60923  
Smith Lewis, LLP  
111 South Ninth Street, Suite 200  
P.O. Box 918  
Columbia, MO 65205-0918  
(573) 443-3141  
(573) 442-6686 (Facsimile)  
knoll@smithlewis.com

Wendy K. Tatro, # 60261  
Associate General Counsel  
Union Electric Company, d/b/a  
AmerenUE  
1901 Chouteau Avenue, MC-1310  
P.O. Box 66149, MC-1310  
St. Louis, Missouri 63166-6149  
(314) 554-3484 (Telephone)  
(314) 554-4014 (Facsimile)  
AmerenUEService@ameren.com

WHEREFORE, AmerenUE respectfully requests that the Commission issue an order dismissing this Complaint or, in the alternative, set the matter for hearing.

Respectfully submitted,

**SMITH LEWIS, LLP**

/s/ Alex R. Knoll  
Alex R. Knoll, #60923  
111 South Ninth Street, Suite 200  
P.O. Box 918  
Columbia, MO 65205-0918  
(573) 443-3141  
(573) 442-6686 (Facsimile)  
knoll@smithlewis.com  
**Attorney for AmerenUE**

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Answer was served on the following parties via electronic mail (e-mail) or via regular mail on this 9th day of December, 2009.

General Counsel Office  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
GenCounsel@psc.mo.gov

Lewis Mills  
Office Of Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
opcservice@ded.mo.gov

Jill C. Beatty  
P.O. Box 1562  
Jefferson City, MO 65102  
Complainant

/s/ Alex R. Knoll  
Alex R. Knoll

EC-2010-0142

Schedule 1 has been marked  
**HIGHLY CONFIDENTIAL**