

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

Shirley Henry,	)	
Complainant,	)	
	)	
vs.	)	Case No. EC-2009-0311
	)	
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 March 2, 2009, Shirley Henry of 5940 Baydy Peaks Road, Unit #921, Osage Beach, MO 65065 (primary address of 5 Mill Race Court, St. Peters, MO 63376) (Complainant) initiated this proceeding by filing a Complaint with the Public Service Commission against AmerenUE.

2. Any allegation not specifically admitted 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. Complainant attached several Exhibits to her Complaint. AmerenUE understands the basis of her complaint to be her belief that she had not used the amount of electricity for which she was billed. The Company has tested the meter at the Osage Beach residence on two occasions and both times it tested within the acceptable range of accuracy. In February 2007 the

meter test showed 99.86% accurate at full load and 99.72% accurate at light load and in March 2009 the meter test showed 99.65% accurate at full load and 99.42% accurate at light load. The Company also checked to see if there was a switched meter situation in February 2007, which they did not find to be the case.

5. Complainant attached as Exhibit No. 1 to her complaint daily usage report spreadsheets for her account which displays the kilowatt-hours used each day and the meter readings from October 15, 2008 through December 29, 2008. AmerenUE believes Exhibit No. 1 to be accurate.

6. Complainant attached as Exhibit No. 2 to her complaint daily usage report spreadsheets for her account which displays the kilowatt-hours used each day and the meter readings from December 14, 2006 through February 14, 2007. AmerenUE believes Exhibit No. 2 to be accurate.

7. Complainant's bills were not estimated at any time (at least for the time period included in Exhibits Nos. 1 and 2) and were based upon the actual usage at her residence. What causes the actual usage is not within the scope of the Company's knowledge.

8. Complainant attached as Exhibit No. 3 a February 16, 2007 letter to the Missouri Public Service Commission alleging she received an excessively inflated and fraudulent electric bill from AmerenUE. The bill complained of was for electric service from January 18, 2007 through February 14, 2007. The Company denies the allegations contained in Exhibit No. 3.

9. Complainant attached as Exhibit No. 4 a December 29, 2008 letter to the Missouri Public Service Commission outlining her present complaint with AmerenUE. The Company denies the allegations contained in Exhibit No. 4.

10. Complainant attached as Exhibit No. 5 a January 13, 2009 letter to The Knolls Resort Condominiums inquiring whether the Association was aware of any conduct that could lead to increased electricity bills for Complainant's property. The condominium association allegedly answered the two questions in handwriting on Complainant's letter. The Company is without sufficient knowledge of the condominium association's role in Complainant's electricity usage and therefore denies any allegations contained in Exhibit No. 5.

11. Complainant attached as Exhibit No. 6 a February 7, 2009 letter to AmerenUE protesting payment of her electric bills. The Company denies the allegations contained in Exhibit No. 6.

12. Attached as Schedule 1 HC to this Answer is a spreadsheet showing actual readings of Complainant's meter on a daily basis from October 15, 2008 through March 17, 2009 and monthly usage from June 2004 through February 2009. These readings are based upon actual usage. These usage reports show that the usage at that residence has consistently been higher in the winter months since Complainant has had service there beginning in 2004. It also shows that the usage has actually been decreasing overall each year.

WHEREFORE, because AmerenUE has, at all times, correctly billed Complainant, the Company 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

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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 6th day of April, 2009.

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