

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

Patricia A. Hill,)	
Complainant,)	
)	
vs.)	Case No. EC-2009-0101
)	
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 September 17, 2008, Patricia A. Hill of 3849 Sullivan Avenue, St. Louis, MO 63107 (Complainant) initiated this proceeding by filing a Complaint 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 pages to her Complaint. AmerenUE understands the basis of her complaint to be her belief that she has not used the amount of electricity for which she has been billed. While AmerenUE cannot speak to whether the electrical usage habits set forth in the Complaint are accurate, the Company has tested the

meter at her residence and it tested accurate - 99.99% accurate at full load and 99.98% accurate at light load. AmerenUE considers both numbers well within acceptable limits.

5. There are actually two accounts at the Complainant's address. It is the Company's belief that the Complainant resides in the upper unit and another party resides in the lower unit. However, Complainant is the customer of record for both accounts. To be sure there was no error in measuring service to the lower unit, the meter for that unit was tested and it also tested accurate - 99.68% at full load and 99.72% at light load.

6. Complainant also attaches a bill summary for her account which shows the kilowatt-hours used each month and the corresponding bill. AmerenUE believes this document to be accurate. Complainant's bills were not estimated at any time (at least for the time period included in the bill summary) and were based upon the actual usage at her residence. What causes the actual usage, unfortunately, is a question that is not within the scope of the Company's knowledge.

WHEREFORE, because AmerenUE believes that it 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,

UNION ELECTRIC COMPANY,
d/b/a AmerenUE

By: /s/ Wendy K. Tatro
Steven R. Sullivan, # 33102
Sr. Vice President, General
Counsel and Secretary
Wendy K. Tatro, # 60261
Managing Assoc. General Counsel

Ameren Services Company
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-3484 (phone)
(314) 554-4014 (fax)
ssullivan@ameren.com
wtatro@ameren.com

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 23rd day of October, 2008.

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

Patricia Hill
3849 Sullivan Ave
St Louis, MO 63107

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

/s/ Wendy K. Tatro

Wendy K. Tatro