

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

Sherry Veach,	)	
	)	
Complainant,	)	
	)	
vs.	)	Case No. EC-2012-0406
	)	
The Empire District Electric Company,	)	
	)	
Respondent.	)	

**ANSWER**

COMES NOW The Empire District Electric Company (“Empire”), by and through counsel, and for its Answer to the Complaint filed herein by Sherry Veach (“Complainant”), respectfully states as follows to the Missouri Public Service Commission (“Commission”):

1. In response to paragraph one of the Complaint, Empire admits that it is a public utility subject to the jurisdiction of the Commission, as provided by law.
2. In response to paragraphs two and three of the Complaint, Empire admits that the Complainant resides at 98 N. Swan Street in Fair Grove, Missouri, and is an electric customer of Empire at that address. Empire further admits that the Complainant has made inquiries to Empire regarding her electric service and meter, that Empire has responded to these inquiries, and that the Complainant has contacted the Staff of the Commission and Missouri Representative Shane Schoeller’s office regarding her electric service and meter. Empire denies all other allegations set forth in paragraphs two and three of the Complaint.
3. Empire denies all allegations not specifically admitted herein. Empire further states that it has been unable to detect any meter error or malfunction or other billing problems related to Empire’s electric service to the Complainant.

4. Further answering, Empire states that it acted in accordance with its tariffs during the subject time period, that the Complaint fails to state a claim upon which the requested relief may be granted, and that it reserves the right to raise additional affirmative defenses which may become apparent through the course of discovery and investigation herein.

WHEREFORE, Empire respectfully submits this Answer to the Complaint filed herein by Sherry Veach and requests that the Complaint be dismissed with prejudice. Empire requests such further relief as is just and proper under the circumstances.

Respectfully submitted,

/s/ Diana C. Carter  
Diana C. Carter MBE #50527  
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ATTORNEYS FOR THE EMPIRE  
DISTRICT ELECTRIC COMPANY

#### **CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission to the Complainant, the General Counsel's Office, and the Office of the Public Counsel on this 5<sup>th</sup> day of July, 2012, and that a copy of this Answer was also sent on this date to the Complainant by United States Mail, postage prepaid.

/s/ Diana C. Carter