

B.

Case No. EC-98-281

Union Electric Company
1901 Chouteau Avenue
St. Louis, Missouri 63166
CERTIFIED MAIL

BY THE COMMISSION

Ask Harry Roberts

(S E A L)

Copy to: Vincent D. Vogler
The Vogler Law Firm, P.C.
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P.O. Box 419037
St. Louis, Missouri 63141-9037

BEFORE THE PUBLIC SERVICE COMMISSION OF THE
STATE OF MISSOURI

FILED

JAN 08 1998

MISSOURI
PUBLIC SERVICE COMMISSION

BADEN AUTOMOTIVE CENTER, INC.,)

Complainant,)

vs.)

UNION ELECTRIC COMPANY,)

Respondent.)

Case No. 90-98-281

COMPLAINT

Complainant does business at 8005 North Broadway, St. Louis, Missouri 63147.

1. Respondent, Union Electric Company of St. Louis, Missouri, is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri.

2. As the basis of this Complaint, Complainant states the following facts:

(a) Baden Automotive Center, Inc., a Missouri corporation, has been a customer of Union Electric Company for approximately six (6) years prior to the date of this Complaint. In April of 1997, Union Electric unilaterally changed the name of Baden Automotive Center, Inc.'s account to Ralph Campbell, d/b/a Baden Automotive Center, and at the same time transferred approximately \$6,000.00 in billings, which Complainant assumes were previously billed to Ralph Campbell, to the account of Baden Automotive Center, Inc.

(b) To the best of Baden's knowledge, Ralph Campbell is not a director nor shareholder of Baden Automotive Center, Inc.

(c) To the best of Baden's knowledge, there simply is no justification for Union Electric Company transferring any of any possible obligations of Ralph Campbell to Baden Automotive Center, Inc.

(d) Union Electric Company, at the time of the transfer of the account balance, threatened to disconnect all of the services of Baden Automotive Center, Inc., if the bills of Ralph Campbell were not paid.

3. Complainant has taken the following steps to present this Complaint to the Respondent:

(a) Baden Automotive Center, Inc., has talked with representatives of Union Electric Company in excess of forty (40) times by telephone in an attempt to resolve this problem. Baden Automotive has also faxed copies of Articles of Incorporation, its Missouri dealer's license, and provided to Union Electric Company corporate information regarding the identity of its Board of Directors, etc.

(b) Baden has continued to act in good faith in an attempt to resolve this obvious mistake, without success. Baden's representatives have repeated their side of the case to Union Electric Company's representatives, Barbara Washington, Frank Lefler, and in-house counsel, Ann Budd.

WHEREFORE, Complainant now requests the following relief: That Union Electric Company be required to immediately reconcile its account balance and delete any and all charges due from anyone other than Baden Automotive Center, Inc., and to

specifically remove any charges not an obligation of this corporate account.

THE VOGLER LAW FIRM, P.C.

By: 

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RECEIVED

JAN 16 1998

COMMISSION COUNSEL
PUBLIC SERVICE COMMISSION

BADEN AUTOMOTIVE CENTER, INC.

By: 

President

cc: VIA FAX: 554-4014
Ann Budd
Attorney for Union Electric