BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Baden Automotive Center, Inc.,)
Complainant,	
vs.	Case No. EC-98-281
Union Electric Company,)
Respondent.)

NOTICE OF COMPLAINT

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

Be advised that on January 8, 1998, Baden Automotive Center, Inc. filed a complaint with the Missouri Public Service Commission against Union Electric Company, a copy of which is enclosed. Pursuant to 4 CSR 240-2.070, the Respondent has 30 days after notification to either file an answer or satisfy the complaint. The Respondent shall file an answer or an explanation of the satisfaction of the complaint on or before February 17, 1998, with the Secretary of the Missouri Public Service Commission, P.O. Box 360, Jefferson City, Missouri 65102, and send a copy to the Complainant. A copy of this Notice was mailed to the Complainant.

BY THE COMMISSION

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge

Hole Hoel Roberts

(SEAL)

G. George, Regulatory Law Judge

Dated at Jefferson City, Missouri, on this 16th day of January, 1998.

Copy to: Vincent D. Vogler
The Vogler Law Firm, P.C.
11330 Olive Blvd. Suite 200

P.O. Box 419037

St. Louis, Missouri 63141-9037

FILED

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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BADEN AUTOMOTIVE CENTER, INC.,	PUBLIC OF MISCOURI
Complainant,	PUBLIC SERVICE COMMUNICATION
Vs.	(case No. 20-98-28)
UNION ELECTRIC COMPANY,	\(\)
Respondent.	;

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:

VINCENT D. VOGLER (M.B.E. #25030)

Attorney for Complainant

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P.O. Box 419037

St. Louis, MO 63141-9037

BADEN AUTOMOTIVE CENTER,

(314) 567-7970

Fax No. (314) 567-5053

RECEIVED

JAN 16 1998

COMMISSION COUNSEL

President

CC: VIA FAX: 554-4014

Ann Budd

Attorney for Union Electric

(Our #26676) 010798 VDV/cjg