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**MISSOURI PUBLIC SERVICE COMMISSION**

PETER B. HOWARD	)	
Complainant,	)	File No. EC-2013-0524
	)	
v.	)	
	)	
Ameren UE	)	
Respondent.	)	

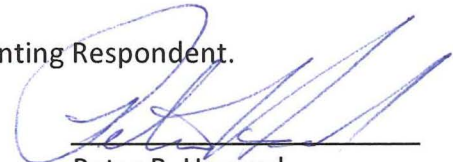
**COMPLAINANT'S CROSS-ANSWER**

1. Respondent seems to be oblivious to the facts of this complaint and the history regarding the same.
2. The Complainant realleges that he was overbilled for non-service at 4111 Maffitt ave. which was subsequently condemned and/or forfeited to the City of St. Louis, MO., by the previous owner who has been deceased since 2011. No attempt to reconnect utility service at that address has been initiated by Complainant or anyone else for that matter.
3. AmerenUE has declared (paragraph 4) that Alicia N. Bell resided at 4111 Maffitt ave. This is in complete error to facts as known by the Complainant. It would appear that Ms. Bell remained at the premises (4453 Athlone ave) later that dates given by Respondent.
4. Respondent declared that service to the vacant premises remained active to the tune of approximately \$200.00+. Complainant believes there not to be any corroborating facts or evidence to support Respondent's claims.

5. Complainant avers that he has not enjoyed service of any kind at the aforementioned residence (including gas, water, etc... 4453 Athlone), but Respondent's continuing avarice has caused Complainant to initiate this action.
6. Complainant further avers that he lives outside the State of Missouri and inherited that property jointly with his brother (Spencer Howard), yet Respondent has singularly focused its energy and harassment on Complainant.
7. Once again, Complainant has ***never requested*** that service at 4453 Athlone be put in his name and avers that Respondent is being disingenuous in declaring the same.

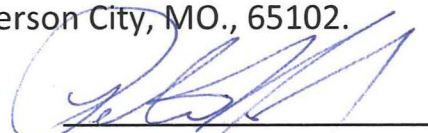
Furthermore, Complainant challenges Respondent to prove the same.

Wherefore, Complainant repeats his desire for relief to the tune of \$125.00 as agreed by conversations between Complainant and Collections representing Respondent.

  
Peter B. Howard

#### **SERVICE INFORMATION**

PLEASE BE ADVISED that on the 17<sup>th</sup>, day of July, 2013, a copy of the foregoing was deposited by first class mail, postage prepaid to Sarah E. Giboney at 111 SO. Ninth, St., Ste. 200, P.O. Box 918 Columbia, MO., 65205-0918, and Nathan Williamss, Deputy Staff Counsel and John Borgmeyer, Associate Staff Counsel (PSC) at 299 Madison St., Ste. 800, P.O. Box 360 Jefferson City, MO., 65102.

  
Peter Howard

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