

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

Therron Nowlin,)	
)	
Complainant,)	
)	
v.)	Case No. EC-2005-0177
)	
Union Electric Company,)	
d/b/a AmerenUE,)	
)	
Respondent.)	

ANSWER

COMES NOW Union Electric Company d/b/a AmerenUE (“AmerenUE”), and for its Answer to the Complaint filed in this proceeding, states as follows:

1. On December 20, 2004, Therron Nowlin of 109 County Highway 468, Steele, Missouri (“Complainant”), initiated this proceeding by filing a Complaint against AmerenUE.
2. 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.
3. In paragraph 2 of the Complaint, the Complainant alleges that over the past ten plus years he has experienced numerous power outages at his home, while his neighbors who are served by Pemiscot-Dunklin Electric have had virtually no outages. The Complainant also alleges that the outages reached a peak in September and October of 2004, and a “brown out” on October 18, 2004 resulted in the destruction of electronic and computer equipment at his home, as well as his business. The Complainant further alleges that his business is located directly across the street from the AmerenUE substation providing power to his home and business. He

alleges that from this vantage point he has witnessed the serviceman resetting the breaker usually about an hour and a half after the outage occurred. Finally, the Complainant alleges that in response to his questions about the frequency of the outages, the AmerenUE serviceman stated that the equipment is outdated and the company needs to spend some major money.

4. In response to the allegations contained in paragraph 2 of the Complaint, AmerenUE admits that it has experienced outages over the past ten plus years in the area where the Complainant is located. AmerenUE has insufficient information to admit or deny the Complainant's allegation that his neighbors who are served by Pemiscot-Dunklin Electric have had virtually no outages, and therefore AmerenUE denies this allegation. AmerenUE admits that outages in the Complainant's area increased in September and October, 2004 until AmerenUE made repairs to its substation in November, 2004. AmerenUE denies that a "brown out" on October 18, 2004 resulted in the destruction of the Complainant's electronic and computer equipment. AmerenUE admits that the Complainant's business is located directly across the street from the AmerenUE substation providing power to his home and business. AmerenUE has insufficient information to admit or deny that the Complainant witnessed the serviceman resetting the breaker from this vantage point, and therefore AmerenUE denies this allegation. AmerenUE also has insufficient information to admit or deny whether the Complainant had a conversation with an AmerenUE serviceman as he alleges, and therefore AmerenUE denies this allegation.

5. In paragraph 3 of his Complaint, the Complainant alleges that he made several phone calls to AmerenUE to complain about poor service and he got an answering machine promising that a company representative would get in touch with him, which they never did. The Complainant also alleges that after the "brown out" of October 18, 2004 he sent a letter to

AmerenUE requesting a claim form to be reimbursed for the electrical equipment he lost. He alleges that he received a letter from AmerenUE stating, and highlighted in yellow, that AmerenUE was not liable in any way.

6. AmerenUE denies the allegations in paragraph 3 of the Complaint. AmerenUE's records indicate that the Complainant contacted AmerenUE on July 20, 2004 and October 25, 2004, and in both instances he spoke to a customer service representative. AmerenUE's records also indicate that the Complainant submitted an oral claim for damaged electronic equipment related to an outage on October 24, 2004 (not October 18, 2004), but that the Complainant never submitted the documentation necessary to pursue his claim.

7. In Complainant's request for relief, he requests authority to change the electric provider at his home from AmerenUE to Pemiscot-Dunklin Electric Cooperative. In view of the fact that the facilities of Pemiscot-Dunklin Electric Cooperative are located immediately adjacent to the Complainant's home, AmerenUE does not object to the Complainant's request, assuming Pemiscot-Dunklin Electric Cooperative is willing to serve him.

Respectfully submitted,

By: /s/ Thomas M. Byrne

Thomas M. Byrne, MBE No. 33340
Associate General Counsel
Ameren Services Company
P. O. Box 66149 (MC 1310)
St. Louis, MO 63166-6149
(314) 554-2514 (Direct Line)
(314) 554-4014 (Facsimile)
tbyrne@ameren.com

Dated: January 20, 2005

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this 20th day of January, 2005.

Dana K. Joyce
P.O. Box 360
200 Madison Street, Suite 800
Jefferson City, Missouri 65102
gencounsel@psc.mo.gov

Therron Nowlin
109 County Highway 468
Steele, Missouri 63877

Steve Dottheim
Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, Missouri 65102
Steve.Dottheim@psc.mo.gov

John B. Coffman
P.O. Box 7800
200 Madison Street, Suite 640
Jefferson City, Missouri 65102
opcservice@ded.mo.gov

Pemiscot Dunklin Electric Cooperative, Inc
John Hall Dalton, Jr.
Dalton, Treasure & Mowrer
P.O. Box 529
Kennett, Missouri 63857
jd.dtmlaw@clgw.net

/s/ Thomas M. Byrne
Thomas M. Byrne