

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

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JEFFERY M. DOZIER	)	
	)	
vs.	)	
	)	
MIDAMERICAN ENERGY COMPANY	)	04-0576
	)	
Complaint as to billing/charges in	)	
in East Moline, Illinois.	)	

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ANSWER TO COMPLAINT

COMES NOW MidAmerican Energy Company ("MidAmerican") and for its Answer to the above-captioned Complaint states the following:

1. MidAmerican admits that an order to connect service for the Jeffrey Dozier account to 155 – 17<sup>th</sup> Ave., East Moline, IL was entered in MidAmerican’s system on January 18, 2003 for the date of January 31, 2003. MidAmerican has no direct knowledge of the remaining allegations contained in paragraph 1 of the Complaint and, therefore, denies the same.

2. In regard to paragraph 2 of the Complaint, MidAmerican admits that an order to connect service at 10922 – 70<sup>th</sup> Street W, Rock Island, IL was issued on January 30, 2003. MidAmerican denies that it received a request to void the connect order to 155 – 17<sup>th</sup> Ave., East Moline, IL on this date.

3. In regard to paragraph 3 of the Complaint, MidAmerican admits that on January 31, 2003, the connect order for service at 10922 – 70<sup>th</sup> Street W, Rock Island, IL

was voided with the following notes on MidAmerican's system: "Nicole advised landlord wanted services to remain in his name."

4. In regard to paragraph 4, of the Complaint, MidAmerican denies the time of the connect as stated by Complainant but admits that connect orders were completed at 155 – 17<sup>th</sup> Ave., East Moline, Il on January 31, 2003.

5. In regard to paragraph 5 of the Complaint, MidAmerican admits that its system notes state that on September 30, 2003, Mr. Dozier was denied new service at 1426 – 20<sup>th</sup> Avenue, Silvis, Il due to two outstanding debts: \$112.62 from 1002 Rebecca Avenue, Carbon, Cliff, IL and \$262.17 from 155 – 17<sup>th</sup> Avenue, East Moline, IL. The notes on the account further state: "Customer indicated that he was divorced when the bill was incurred at 155 – 17<sup>th</sup> Avenue, East Moline, IL and he would bring divorce decree into the customer office."

6. In regard to paragraph 6 of the Complaint, MidAmerican admits that on October 1, 2003 Mr. Dozier went to the Moline, IL MidAmerican customer office, paid the \$112.62 debt as well as 1/6 of the \$262.17 debt and signed a payment agreement contract on the remaining balance. MidAmerican also admits that on October 8, 2003, Mr. Dozier supplied a letter from Lori Medina, Office Assistant, of Mel Foster Co. Real Estate Management, dated October 8, 2003, stating that Jeffrey Dozier did not live at 155 17 Avenue, East Moline, IL during the time period January 2003 through March 2003 as he was not approved for renting this property. MidAmerican denies receiving a request to void the connect order at the 155 – 17<sup>th</sup> Avenue, East Moline, IL address.

7. In regard to paragraph 7 of the Complaint, MidAmerican admits that it did perform an internal investigation in response to Complainant' allegation that his wife had

requested the connect order for the East Moline address be voided and further admits that, having found no support for that allegation, MidAmerican again denied Complainant's request to be relieved of the debt. MidAmerican denies all remaining material allegations contained in this paragraph of the Complaint.

8. There being no allegations against MidAmerican in paragraph 8 of the Complaint, MidAmerican does not reply to same.

9. There being no allegations against MidAmerican in paragraph 9 of the Complaint, MidAmerican does not reply to same.

10. There being no allegations against MidAmerican in paragraph 10 of the Complaint, MidAmerican does not reply to same.

11. In regard to paragraph 11 of the Complaint, MidAmerican denies the material allegation thereof.

WHEREFORE, MidAmerican Energy Company states its actions have been in compliance with the requirements of the Public Utilities Act, Illinois Commerce Commission rules and MidAmerican tariffs.

Respectfully submitted,

MIDAMERICAN ENERGY COMPANY

BY: Karen M. Huizenga  
One of its attorneys

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VERIFICATION

STATE OF ILLINOIS                    )  
  )        ss.  
COUNTY OF ROCK ISLAND        )

I, Karen M. Huizenga, being first duly sworn on oath depose and state that I am an attorney for MidAmerican Energy Company; that I have read the foregoing Answer and know the contents thereof, and further state that the factual allegations in said Answer are true and correct to the best of my knowledge and belief as of the date of this Verification.



Subscribed and sworn to before me, a Notary Public in and for Rock Island, Illinois, this 29<sup>th</sup> day of November, 2004.

  
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Notary Public

