

For Commission Use Only:
Case: 28-0258

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION

FORMAL COMPLAINT

Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, Illinois 62701

ORIGINAL

Regarding a complaint by (Person making the complaint):

Chris & Meghan Dewes

Against (Utility name):

AmerenIP

As to (Reason for complaint)

unfair billing - see attached for full description

in Franklin Illinois.

CHIEF CLERK'S OFFICE
2008 APR - 8 1 P 12:33
ILLINOIS COMMERCE COMMISSION
1/28/08

TO THE ILLINOIS COMMERCE COMMISSION, SPRINGFIELD, ILLINOIS:

My mailing address is

1739 County Road 2400 North, Franklin, IL 61878

The service address that I am complaining about is

Same as above

My home telephone is

[217] 642-2700

Between 8:30 A.M. and 5:00 P.M. weekdays, I can be reached at

[217] 751-2000

My e-mail address is meghane@mhfa.net

I will accept documents by electronic means (e-mail) Yes No

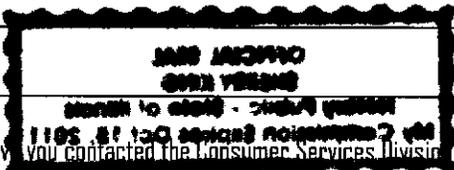
(Full name of utility company) AmerenIP

(respondent) is a public utility and is subject

to the provisions of the Illinois Public Utilities Act.

In the space below, list the specific section of the law, Commission rule(s), or utility tariffs that you think is involved with your complaint.

83-II Admin Part 280.80 and 83-II - admin part 280.75 ; 83-II - admin part 280.76



Have you contacted the Consumer Services Division of the Illinois Commerce Commission about your complaint?

Yes No

Has your complaint filed with that office been closed?

Yes No

Please state your complaint briefly. Number each of the paragraphs. Please include time period and dollar amounts involved with your complaint. Use an extra sheet of paper if needed.

see attached

Please clearly state what you want the Commission to do in this case:

We want to have the Commission arbitrate this complaint to help both parties come to a fair resolution.

NOTICE: If personal information (such as a social security number or a bank account number) is contained in this complaint form or provided later in this proceeding, you should submit both a public copy **and** a confidential copy of the document. Any personal information contained in the public copy should be obscured or removed from the document prior to its submission to the Chief Clerk's office. Any personal information contained in the confidential copy should remain legible. If personal information is provided in your public copy, be advised that it will be available on the internet through the Commission's e-Docket website. The confidential copy of any filing you make, however, will only be available to Commission employees. If you file both a public and confidential version of a document, clearly mark them as such.

Today's Date: 3-31-08
(Month, day, year)

Complainant's Signature: *Meghan M. Drewes*

If an attorney will represent you, please give the attorney's name, address, telephone number, and e-mail address.

When you finish filling out this complaint form, you need to file the original with the Commission's Chief Clerk. When filing the original complaint, be sure to include one copy of the original complaint for each utility company complained about (referred to as respondents).

VERIFICATION

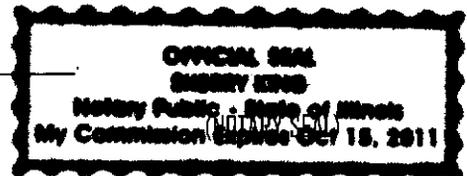
A notary public must witness the completion of this part of the form.

I, *Meghan M. Drewes*, Complainant, first being duly sworn, say that I have read the above petition and know what it says. The contents of this petition are true to the best of my knowledge.

Meghan M. Drewes
Complainant's Signature

Subscribed and sworn/affirmed to before me on (month, day, year) 3-31-08

Sherry King
Signature, Notary Public, Illinois



NOTE: Failure to answer all of the questions on this form may result in this form being returned without processing.

Chris and Meghan Drewes
Formal Complaint with Illinois Commerce Commission

ICC Number: 07-18421

AmerenIP Account Number: 65190-97132

① We contacted AmerenIP after receipt of our power bill for \$1,735.74 for service dated February 20, 2007 through March 20, 2007 which stated we used 19,237 KWH. The customer service representatives agreed that the kilowatt usage was extremely large and stated that a lot of small businesses in Champaign-Urbana do not use that much power. We relayed to them the following:

Facts about our property:

- 2100 Square foot ranch home
- The home is 3 years old (we moved in the second week of October in 2005)
- The home has 6" walls with R19 insulation and R38 insulation in the attic
- All doors are insulated doors and all windows are double pane low E glass vinyl windows
- The heating and cooling system is a geothermal system
- There have been no additions or removals of any electric items in the home (except see next item)
- The appliances are all less than 1 year old and are all energy efficient appliances
- In the winter the temperature is set at 69 degrees and we leave it set at that 24 hours a day which is the ideal use per the manufacturer of the geothermal system
- In the summer the temperature is set at 70 degrees and we leave it set at that 24 hours a day which is the ideal use per the manufacturer of the geothermal system
- The same people live in the home now as always have
- Our habits in the home have not changed; we both work all day and are home on weekends and in the evening only; all lights are turned off while we are gone

② On January 2, 2007 a new meter was installed at our property which was prior to any issues we were having; this was one of the new satellite reading meters that AmerenIP was installing at rural homes. It appears this satellite meter was not utilized for its satellite capabilities until the service period we are disputing because the month following this installation the power usage was estimated (January 22 to February 20, 2007). During the next service period (February 20 through March 20, 2007) it appears the satellite capabilities were used as the reading was actual and that is the month that the number of kilowatt hours soared. On April 3, 2007 that meter was removed and a new one replaced the old. The old meter tested at 100.5% accuracy and it read usage of 22,191 KWH. Jan, a supervisor of customer service, called us to inform us that the meter was operating perfectly; she spoke with Chris on April 19, 2007. Once we had the replacement meter installed with a confirmed beginning reading we have not had any problems with our usage or billings.

- ③ Chris discussed how outrageous the usage was and Jan investigated our past usage and agreed it seemed highly abnormal. She suggested we hire someone to test our system. We did so and the contractor's findings were that there is no way possible for our home to use that much power in the given time period with every electrical item turned on in the home. He also tested the power lines that were new and installed when the home was built in 2004 that run to the out buildings to ensure there was no leak in the system that was causing us to use that much power; the results were that those power lines were fine and not causing a problem. See the contractor's findings attached at Exhibit A.
- ④ Chris discussed these results with Jan again on May 8, 2007. Jan then called Chris back on that date on his cell phone and told him she thinks the meter that was placed in service on January 2, 2007 already had hours on it but it was recorded with 0 KWH in AmerenIP's system; Jan stated this has happened before with other customer's accounts. Therefore, the usage showed over 19,000 KWH but that was not accurate. Jan suggested she average the kilowatt usage the prior 2 years during that time period (February 20 through March 20) and charge us that many kilowatt hours at the current rates. Chris agreed that was a fair resolution. Jan instructed Chris to send in a \$300 payment; she quickly calculated this number and said the actual bill should be for around this amount. Jan stated she would correct our account to reflect the new estimated amount. We paid the \$300 on May 8, 2007.
- ⑤ Upon receipt of the revised bill our account was only credited \$746.46 leaving a balance of \$989.28 which was significantly higher than our agreement and discussions with Jan. Chris called Jan several times and left her several messages to call one of us back. We never received a reply from Jan so we contacted customer service to speak with another supervisor. We reached Gwen at extension 19405 and discussed our account with her. Jan was on vacation during this time but Gwen reviewed our account and wanted to discuss it with Jan once she returned. Gwen returned our call about a week later and stated that they reviewed the account and that we should have never received a credit back in the first place and there was nothing else they would do for us.
- ⑥ Meghan asked Gwen to look at the account one more time because of the severe increase in the usage of power and the above facts. Gwen did review the account and the response was the same; we deserved no credit and we owed the money. Gwen claims the 19,237 kilowatts used was for a period of 90 days usage however if you look at the bills for the 90 days prior to that there was an actual reading for the service from December 15, 2007 through January 22, 2007. The next billing period was estimated which is January 22, 2007 through February 20, 2007. Then the next period is from February 20, 2007 through March 20, 2007 which is also an actual reading, this is the month in dispute. The months prior to the month at issue we were billed for services at a standard and seemingly reasonable rate.
- ⑦ During our discussions with Gwen, Jan and all other customer service representatives no one can explain to us how they arrived at the credit that we received. In analyzing the activity that occurred on our account (see Exhibit C) the credits back for

the mistake appear unfair. The original bill from December 15, 2006 to January 22, 2007 was cancelled which had been an actual reading and the kilowatt hours were increased from 1,350 to 3,971. Then it appears there is no reasonable calculation for the revised kilowatt hours for the service periods from January 22 through February 20, 2007 and February 20 through March 20, 2007. The total number of kilowatt hours was randomly decreased by 6,368 for a total of \$571.81.

- ⑧ Meghan asked Gwen if the old meter that was installed in January 2007 was still available so it could be inspected or read for usage prior to our installation date; Gwen's response after investigation was that that meter was dismantled and parts were used in other meters to repair them so it was impossible to perform any additional tests.
- ⑨ Gwen stated to Meghan that a subcontractor had installed the new satellite meters; Meghan asked that Gwen obtain records from the subcontractor that proved the meter started with 0 KWHs. Gwen contacted the subcontractor and they had no records with starting KWHs on the meters they had installed for AmerenIP and they could not prove the meter started with 0 KWHs or any number of KWHs.
- ⑩ Given these facts and the original agreement offered to us by Jan we believe it is only fair that we be charged for the average kilowatt hours used in the prior two years for this time period prorated for the power rates at the time of the billing in 2007. Meghan created Exhibit B which states the KWHs used, the dollar amounts charged, and if the readings were estimated or actual for the time period from December 17, 2005 through March 19, 2008. These figures were provided to Gwen during the discussions of the bills.
- ⑪ Using these figures Meghan calculated that the average KWH usage for the prior two years during the February through March service time to be 4,443.5 KWHs. Please note that the 2005 amount was an actual reading after 2 months prior of being estimates so the 6,389 KWHs is overstated; however to make the calculation simple Meghan used what was there; so in essence the amount calculated below is a little overstated. Multiplied by the rates during the 2007 billing the total bill should have been \$502.15. We have remitted a total of \$502.15 (\$300 on May 8, 2007 and the remaining \$202.15 on September 14, 2007) to pay for this bill. We feel it is only fair that the remaining balance due of \$769.97 which includes interest charges be removed from our account. We have paid AmerenIP what we feel we rightfully owe and have continued to pay the current monthly charges as they become due.
- ⑫ Also we would like to note that we have spoken with other customer service representatives at AmerenIP and all are taken aback by the huge amount of KWHs we are being charged and they believe there is something wrong with that amount. Also, we have had the customer service representatives read back the transcripts on our account on more than one occasion and at times the transcripts have been altered and the records stating what the agreement was with Jan were erased. There are no notations on how Jan calculated the amounts she credited back to our account and what she left remaining to bill us.

18

Please see the attached spreadsheet which accounts for our power usage since December 2005 (which was less than 2 months after the home was built and we moved into the property). Over 37 periods we average a usage of about 3,408.5 KWHs per month. Therefore the 4,443.5 KWHs that we have based our calculations on appears reasonable. We would appreciate your help to resolve this matter.