

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

Craig Mershon       )  
Complainant,       )  
                              )  
                              )  
                              )

File No. EC 2013-0521

**FILED<sup>3</sup>**

**MAY 9 2014**

**Missouri Public  
Service Commission**

vs

Union Electric Company a/k/a Ameren Missouri  
Respondent,

**OBJECTION TO AMEREN MISSOURI'S MOTION  
FOR RECONSIDERATION OR FOR THE AMENDED  
ORDER AND A MOTION TO STAY**

Comes now, Mr. Craig Mershon with a Motion to Object to Ameren Missouri's  
Motion for Reconsideration or for Amended Order states as follows:

1. Mr. Mershon has asked in a previous pleading to stop or cease the threatening, intimidating, hurtful disconnection notices that come in two colors yellow and pink. The pink color being the worst. It is true Mr. Mershon has asked that the disconnection notices be part of his complaint. They are in dispute. Mr. Mershon welcomed the fact that the disconnection notices were ceased as of March 14, 2014.

2. In the Order, the Commission ordered the company to “cease any disconnection of Mr. Mershon’s service pending the Commission’s decision on the merits of Mr. Mershon’s complaint. Mr. Mershon continued to complain about the harsh threatening disconnection notices that not only affects everyone who are behind in their payments to the company, they also affect people with disabilities needing electrical service to operate their medical equipment and all disabilities are very serious, not just a few of them.

3. Ameren Missouri may also file a motion for a hearing to show the disconnection notices are based on undisputed amounts. The reason for Mr. Mershon asking the disconnection notices cease is because they put a lot of pressure on him and others to come up with a lot of money and not giving any of them enough time to get to a payment station are find enough money to pay the company. The company should find another way of informing their customers about the amount of money due because of late payments or any other situation a customer happens to have at any given time.

4. Mr. Mershon kept his agreement under the Cold Weather Rule and instead of paying \$13.31 which Mr. Mershon was asked to pay. He decided to pay \$40.00 since the company asked him for \$164.00. After paying \$164.00 Mr. Mershon had a bill for \$608.00. When he received his bill he was very surprised after paying \$164.00 he came up with a bill of \$608.00. Mr. Mershon is in the process of completing an Amended Complaint.

5. The Order is very relevant to this case. The company has been threatening and hurting others for many years.

Mr. Mershon has been hurt for many years as well as many other people with disabilities, the elderly, the indigent, and the African-Americans. At this time until the other Amended Complaint has been filed Mr. Mershon's only undisputed amounts are those that have been recently given to him. Mr. Mershon does not have the privilege of knowing what 4 CSR 240-13. 050 (1) (A) happens to be because Ameren Missouri's attorney as well as the Missouri Public Service Commissions attorney refused to give Mr. Mershon the documents he needed to prove his case. There is a law that prevents the company from discriminating and hurting others who are human beings both laws are as follows: the Civil Rights Act 1964 and the Americans with Disabilities Act 1990. The company has violated both of these laws yet they recite state laws that allow them to hurt, damage and kill. Mr. Mershon has properly documented he does not think the amounts of \$608.00 is fair to him and it is in a document that he drafted as his, "Petition."

6. Since Mr. Mershon does not have any of the Code of State Regulations (CSR). The Regulatory Judge Mr. Daniel Jordan as well as both attorneys refused to give him what he has asked for in his First Set of Productive Documents he cannot follow any of the rules because he does not have them.

7. The Customer Service Department with the Missouri Public Service Commission has refused to set up any payment arrangements with Mr. Mershon. Mr. Mershon tried to set up a payment arrangement to pay on the bill that was \$608.00 and was told by one of the Customer Service Representative he would have to pay \$300.00 in order for the company to accept any money from him.

The Customer Service Representative was named Abre (last name refused to be given). Mr. Mershon told this lady that he was unable to pay so much money because he is on a fixed income it meant nothing to her. She was only concerned about the amount of money she could get back from Mr. Mershon in her so-called policies. There was no care for his concerns are situation at all.

8. The Order is very reasonable because it does not undermine the complaint process what it does is to prevent the company from further hurting Mr. Mershon and other customers as the company is famous for doing. They have hurt, intimidated, put fear in customers, and threatened them for many many years. Ameren Missouri has a habit of trying to hurt other human beings and that is why Mr. Mershon is trying to file a complaint to change how they treat other human beings. They are justifying their reason for hurting and hating in their motion they have just filed.

9. Mr. Mershon stated in this pleading he does not waive any rights he has available to him. Mr. Mershon did contact Mr. Morris Woodruff, Secretary of the Missouri Public Service Commission who seems the only nice one other than the administrative staff that are eager to help Mr. Mershon. No one else is eager to help. They make excuses and justify hurting other people.

10. The Order is a continuation of reasonableness because it is supposed to address Mr. Mershon's as well as other people with disabilities concerns about being disconnected at the whim of the company. Mr. Mershon as well as hundreds of people with disabilities who use electrical equipment has special circumstances. It is so ironic the company sends out information asking people with disabilities using electrical equipment to supply them with information then disregard it.

They disconnect the people despite their unusual circumstances. The Order is not treating Mr. Mershon any differently under any special circumstances. He is following the alleged policy stating that if a person has any special circumstances the company should know about and if they have any disabilities that warrant special circumstances the company should know about them. Mr. Mershon has taken the liberty to let them know of his special circumstances. The other people with disabilities and who use electrical equipment have the same problems as Mr. Mershon has dealing with his disability. There is nothing odd about how The Order works. Mr. Mershon agrees wholeheartedly with The Order. The company treats people with disabilities with disdain and hatred. Then they want to help. So the policy set forth from Ameren Missouri in this pleading is very unfair and unlawful as well as anything this company has because Mr. Mershon does not have the opportunity to view any law since he was not given the right to any information.

10. Finally, The Order is in proper order because the company has discriminated and shown hatred and harshness towards their customers with these harsh and intimidating disconnection notices. Mr. Mershon is arguing how the company uses the disconnection notices to hurt other people. They should be drafted in a different way and used only when necessary not when the company wants money. The company should be amicable enough to work with the customers so they can feel comfortable with the company rather than the company using abusive of power. The use of the disconnection notices are in dispute in Mr. Mershon complaint.

11. Mr. Mershon applauds the way that the Commission has stopped these horrendous, racial, discriminatory disconnection notices the company issues when they want their money. They have admitted wanting to hurt others within their pleading when they say, “no electrical corporation shall make or grant any undue or unreasonable preferences what advantages to any person.” At the same time they are asking for people who use electrical equipment to notify them and have them sign a form signed by a medical doctor. Then say the most important people cannot be disconnected.

12. Mr. Mershon is simply fighting for his rights and rights of people with disabilities such as his because the company treats the protected groups with disdain and hatred and does not care about them as people. The information contained in their pleading has proven they have treated and are treating people with hatred and disdain. Again, since Mr. Mershon does not have any of the information that was requested in his pleading he can only go by information he has and the information contained in the document that was signed for him to get assistance in being a person with a disability.

## **MOTION TO STAY**

Mr. Mershon is asking that The Order remain as it is because of the following.

1. The Commission is honoring people with disabilities who use electrical equipment including Mr. Mershon from being disconnected if they are unable to pay on their bill in a timely manner. Mr. Mershon nor is any other person with a disability asking for free service. They are asking they have the opportunity to stay connected while they pay on their utility bills without a threat of harm.

2. The disconnection notices are drafted in such a way that is harsh and threatening, intimidating, and fearful. No one should have to undergo such fear in order to pay their bills which they are trying to do in this economic downturn.

3. Not being under such pressure to pay bills is very relaxing and since the notices have been discontinued will make the effort of paying bills a lot easier on Mr. Mershon's nerves as well as his other well human beings.

4. The Order is only valuable to Ameren because they wanted extinguished because they want to continue to hurt other people knowing they are showing their power they have abused their power for so long it has become a habit with them.

9. Mr. Mershon has never filed any unfounded information with The Commission or Ameren. All of the complaints are justified Ameren refuses to make restitution of the complaints they make excuses on a constant basis justifying their excuses by using laws that Mr. Mershon has not seen.

10. Given Ms. Gibney's crudeness with Mr. Mershon's complaint it appears that she has left her side be known by the way she makes accusations that are not true. Mr. Mershon does complain about the disconnection notices because of the way they are drafted and they are very threatening and intimidating for Mr. Mershon as well as many other customers. Mr. Mershon is not gaming The Commission to avoid a disconnection as long as possible. Mr. Mershon believes that the notices can be kinder and very informational if the company would take time to be a kind and gentle company even though they want their money. Mr. Mershon is not dragging out this complaint by calling The Commission even though he is facing a disconnection notice for an amount that is due. The Commission should keep the disconnection notices silent because of these

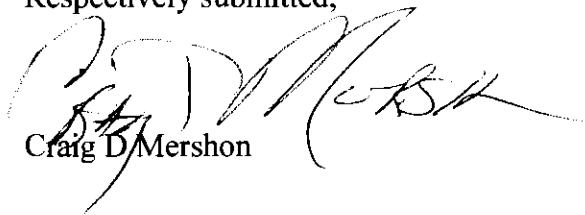
reasons and others. Mr. Mershon does not believe the disconnection notices or proper. They are annoying as is Ms. Giboney as she has answered all of the pleadings that Mr. Mershon and The Commission has sent without giving Mr. Mershon a chance to answer a lot of them. Mr. Mershon can prove his claim all Ms. Giboney has to do is to read how the notices are drafted. Mr. Mershon is quite confident Ms. Giboney is educated enough to understand what harshness is and that her clients are being that way with the disconnection notices. She is so concerned with the laws the company works under she does not care how the customers have been treated.

**Wherefore,** Mr. Mershon respectfully request that The Commission keep its Order to Cease Disconnection Notices in place until a workable solution can be concluded and that a Motion to Stay be put in place so that Mr. Mershon will not receive any disconnection notices until this complaint has been resolved because the notices or under dispute as the amount he is to pay. Mr. Mershon disputes all of the amounts the company has put him under, but he has paid at least \$100.00 each month on his electric bill. He has yet to pay this month bill because of other circumstances that have arisen, but he does plan to pay on this bill for this month before the end of the month. Mr. Mershon is more than willing to have a hearing once the information he has requested under discovery be granted to him. Mr. Mershon has been very cooperative, but he refuses to allow Ms. Giboney to control him which she has been trying to do from the very beginning of this complaint. Mr. Mershon has indicated how the disconnection notices have been in his Petition. Mr. Mershon believes if Ms. Giboney would read the Petition she would see that Mr. Mershon is disputing not only the amount he is being charged, but



the disconnection notices are in dispute too. Mr. Mershon is really thinking of filing litigation against the Union Electric Company as well as their attorneys and the Missouri Public's service Commission for allowing Ms. Giboney to treat Mr. Mershon in a very disrespectful manner. Mr. Mershon does not have any of the laws that Mr. Giboney sites in her pleading.

Respectively submitted,

A handwritten signature in black ink, appearing to read 'Craig D. Mershon', with a stylized flourish at the end.

Craig D Mershon