

FILED**MAY 21 2014****Missouri Public
Service Commission****BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
IN THE STATE OF MISSOURI**

Craig Mershon)
Complainant,)
)
)
)

File No. EC 2013-0521

vs

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

**MOTION TO DISMISS THE REPORT AND ORDER
UNDER 4 CSR 240-2.116**

Comes now, Mr. Craig Mershon requesting a dismissal of the Report and Order filed by Mr. Daniel Jordan, Regulatory Judge and the Report and Order filed by the Commissioners. Mr. Mershon is in the process of answering Mr. Jordan's discriminatory Report and Order because Mr. Jordan was very unfair and not letting Mr. Mershon have a hearing or complete discovery. Mr. Jordan took it upon himself to file a Report and Order without notifying Mr. Mershon from the onset that this action would be taken if certain conditions were not met. Mr. Jordan's filing had no issue date, but the Commissioners had it issued date of May 23, 2014. Mr. Mershon believes that both parties were very unfair to him and he has been complaining about the treatment through many letters and through conversations with Mr. Morris Woodruff, Secretary for the Missouri Public Service Commission, but nothing has been done up to this point about the mistreatment.

The Commissioners have not heard Mr. Mershon's point of view on anything. Every point of view has been either Ms. Sarah Giboney, Attorney for Ameren Missouri with Smith and Lewis LLP and Mr. Jeffrey Keevil, Attorney for the Staff with the Missouri Public Service Commission. There are several pleadings that have not been answered that Mr. Mershon filed. He is in the process of filing another pleading asking for another Regulatory Judge. Hopefully he will get one that will listen to him as well as the other side. To this date that has not happened. Everything that has been said has been from the point of Ms. Giboney or Mr. Keevil. Mr. Mershon has been at a disadvantage from the onset of this complaint. He does not have the money to hire an attorney. He does have facts in his case if only he was able to finish his discovery and get the information he has requested. Mr. Wess Henderson, Director of Administration has promised Mr. Mershon he would get anything Mr. Mershon requested a letter has been sent to Mr. Henderson. Without any information it will be very difficult for Mr. Mershon to win his case because he has no information. The rules and regulations that Mr. Mershon has mentioned in his pleadings has come from Mr. Morris Woodruff. Mr. Mershon has no other information to prove his case except for the information given by Mr. Woodruff through an ex parte conversation Mr. Mershon has had with Mr. Woodruff. This is unfair treatment and it should be noted that Mr. Mershon has tried to cooperate with the Commission, but in turn no one is cooperating with him.

Wherefore, Mr. Mershon is requesting a dismissal of the Report and Order of both Mr. Jordan and the Commissioners so he will have a chance to finish his discovery and get information he needs to prove his case.

This is only fair. He is entitled to do discovery under 4 CSR 240-2.090 which discusses discovery issues and Mr. Mershon is entitled to file Interrogatories, Request for Admission, Motion to Produce and Depositions. Mr. Mershon realizes depositions cost money, He is unable to pay for any of this process because he is a beneficiary of the Social Security Administration (SSA) and he receives Social Security Disability Insurance (SSDI) he is barely able to pay the bills that he has today including electricity. Mr. Mershon uses an electric motorized scooter to ambulate, With this being said Mr. Mershon is asking for a dismissal because he will not be able to have a hearing without the proper discovery. He is entitled to a hearing under 4 CSR 240-2.110. Hopefully the Commissioners will allow Mr. Mershon to have a hearing.

Respectively submitted,

Craig D Mershon

Plaza Executive Suites
17285 Chesterfield Airport Road
Suite 200
Chesterfield, MO 63005
(636)530-0058

PLAZA
EXECUTIVE SUITES

Fax

To:

Morris Woodruff

From:

Craig Mershon

Fax:

573-526-6010

Pages:

7

Phone:

Date:

5/21/14

Re:

CC:

Thank-you

Urgent

☒ For Review☒ Please Comment

Please Reply

☐ Please Recycle