

Before the public Service Comm'n
of the State of Missouri

Jimmie E. Small)
Complainant)

FILED

OCT 27 2014

Missouri Public
Service Commission

v.

Case NO. EC-2015-

0058

Union Electric & Co.)
Ameren Missouri)
Respondent)

Complainant's Motion to strike
Respondent's alleged debt due
dated September 08, 2014, Exhibit
"A" NO:

1. Schedule F Reverse side of
Schedule 6, Exhibit A, dated
September 08, 2014 appears as
evidence in a prior proceeding
cause NO: EC-2012-0050

2. That the alleged debt due,
prior informal complaint
(C 201104337) details, Appendix A
in the alleged amount of \$846.15
is the exact same dispute in

NO: EC-2011-0247; EC-2012-0050
and continuing in NO: EC-2015-
0058.

3. The commission should strike
utilities Exhibit "A" alleged bill
content, dated September 08, 2014,
as that alleged debt due issue
has been previously litigated
before Hon. ALJ Bushmann,
on Transcript recording,
admission by S. Tiboney to the
effect that back in NO: EC-2012-0050,
utility, Ameren Missouri was
not trying to collect money
from customer, Jim Small.

4. Based on the stated admission
by Counsel Tiboney, Transcript
evidence, NO: EC-2012-0050,
NO money was due on account
NO: 34433-07018 when that
dispute / contested claim was
previously tried. See 4 CSR-
240-13.050 (1).

5. Contested case NO: EC-2011-0247;
NO: EC-2012-0050; And NO: EC-2015-
0058 based on the record involved)

A disputed, alleged electric
bill, situated at Lot #23,
23067 patten trail, Kennesaw,
Ga. was a valid dispute
under

4 CSR 240-2.070(4)

7. Formal Complaint, Motion
to strike the alleged debt of
\$846.15 should be granted in
NO: EC-2015-0058 as the Respondents
utility continued to use Mo.
public service commission,
[State Acton] staff - Carol Gay
Fred and Mr. Alexander Antal
to violate privacy Act laws
through circulation of HC
documents and did so while
acting in concert with Res-
pondent Counsel S. Siboney and
W. Tatro. These admitted facts
would appear as sufficient
and substantial evidence to
conclude that filed tariff agree-
ments, rules and regulations have
been violated and continuing
in NO: EC-2015-0058. See
4 CSR 240-2.070(4) Formal Complaint

8. The presiding ALJ Jordan should enter an appropriate Commission Order striking Respondent's Exhibit "A" Content, based on collateral estoppel, issue preclusion and res judicata, where Utility Respondent, Ameren Missouri, had a full, fair, opportunity to litigate any disputed electric bill issues before the prior ALJ Hon Bushmann back in No. EC-2012-0050.

wherefore, the undersigned complainant prays the comm'd ALJ enter an appropriate Order striking the alleged past due account debt of \$846.¹⁵, And enter such further Order as summary disposition the Hon Jordan Court deem fair on the above given premises.

Respectfully Submitted
Erin E. Small
606 West Hwy #2
Milton, IA 52570.
52570.

Certificate of Service

I hereby certify that copies of the foregoing motion to strike summary disposition as to alleged debts due, have been mailed to Counsel

S. Gibney, Columbia, Mo. office, also to Data Center, Mo. pub. Serv. Comm'n And Copy to public Counsel, all done this Friday, October 24, 2014.

Jimmie E. Small

JIMMIE E. SMALL

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