

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

FILED³

FEB 13 2014

Craig Mershon)
Complainant,)
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)

File No. EC 2013-0521

**Missouri Public
Service Commission**

vs

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

**FIRST SET OF DOCUMENTS FOR
A MOTION TO PRODUCE**

Pursuant to Rule 240 from the State Rules of Civil Procedure (CSRP) Mr. Craig Mershon is requesting the following documents to begin the discovery process which has not taken place as of this time. This document will begin the discovery process which is at its beginning stages. No other discovery process has been taken place since the reopening of this case. The following documents are requested:

1. All documents pertaining to disconnections from the viewpoint of the Code of State Regulations (4CSR240-2.080).
2. All documents pertaining to customer service from the viewpoint of CSR.
3. All documents pertaining to treatment of customers from the viewpoint of CSR.
4. All documents pertaining to the treatment of people with disabilities from the viewpoint of the CSR.

5. All documents pertaining to the treatment of the elderly from the viewpoint of the CSR.
6. All documents pertaining to the treatment of African-Americans from the viewpoint of the CSR.
7. All documents pertaining to the treatment of the indigent from the viewpoint of the CSR.
8. All copies of the yellow disconnection notice that the Union Electric Company a.b.a/ Ameren Missouri uses to inform or threaten the customers and impending disconnection from the viewpoint of the CSR.
9. All copies of the red disconnection notice that Ameren Missouri puts out to inform or threaten customers of upcoming disconnections from the viewpoint of the CSR.
10. All copies of rules and regulations pertaining to the CSR regarding assistance the company gives all customers in need of energy assistance.
11. All copies of rules and regulations pertaining to assisting those people with disabilities who are customers with Ameren Missouri.
12. All copies of rules and regulations pertaining to the due process system from the viewpoint of the CSR.
13. All copies of rules and regulations pertaining to the administrative process from the viewpoint of CSR.
14. All copies of rules and regulations pertaining to making suitable arrangements for customers to pay their bills from the viewpoint of the CSR.

15. All copies of rules and regulations pertaining to the regulations dealing with setting up and calculating how payments are set up in regards to billing from the viewpoint of the CSR.
16. All copies of rules and regulations regarding the Cold Weather Rule from the viewpoint of the CSR.
17. All copies of rules and regulations pertaining to the regulations regarding those people with disabilities who use electrical motorized equipment to sustain their lives from the viewpoint of the CSR.
18. All copies of rules and regulations pertaining to the dealing with documents people with disabilities need to prove to the company they have electrical motorized or respiratory equipment needed for the sustaining of their lives from the viewpoint of the CSR.
19. All documents pertaining to people with disabilities and their addresses of those who have documented disabilities within the St. Louis area.
20. All copies of amicable documents pertaining to the customer in any situation involving the company.

DOUMENTS FROM THE MISSOURI PUBLIC SERVICE COMMISSION

Documents from Missouri Public Service Commission in order to complete these initial steps are as follows:

1. All documents from the Missouri Public Service Commission pertaining to their viewpoint of disconnection notices and their effort to make things satisfactory for the customer.
2. All documents from the Missouri Public Service Commission pertaining to their viewpoint of customer service and their effort to make things satisfactory for the customer.
3. All documents from the Missouri Public Service Commission pertaining to their viewpoint of the treatment of customers and their efforts to satisfy the customer.
4. All documents from the Missouri Public Service Commission pertaining to their viewpoint of the treatment of people with disabilities and their efforts to satisfy the customer.
5. All documents from the Missouri Public Service Commission pertaining to their viewpoint of the treatment of the elderly and their efforts to satisfy the customer.
6. All documents from the Missouri Public Service Commission pertaining to their viewpoint of the treatment of the indigent and their efforts to satisfy the customer.
7. All documents from the Missouri Public Service Commission pertaining to their viewpoint of the treatment of African-Americans and their efforts to satisfy the customer.
8. All documents from the Missouri Public Service Commission pertaining to their viewpoints of the reasons for disconnections with the yellow disconnection notices and the red disconnection notices and their showing up how they assisted the customer.

9. All documents from the Missouri Public Service Commission pertaining to outages and the effort the company made to assist those people with disabilities in such situations.
10. All documents from the Missouri Public Service Commission pertaining to how the company does not threaten with the yellow disconnection notices and the red disconnection notices.
11. All documents from the Missouri Public Service Commission showing the company does not threaten or intimidate the customer.
12. All documents from the Missouri Public Service Commission pertaining to the due process system that the Commission uses to assist its customers.
13. All documents from the Missouri Public Service Commission pertaining to the administrative due process system beyond the customer service weakened due process system.
14. All documents from the Missouri Public Service Commission listing the administrative personnel which customers should be available to use if disagreements are evident beyond the Customer Service level.
15. All documents from the Missouri Public Service Commission showing how the customer service department laid out arrangements for various customers in regards to the due process system within the Customer Service Department.
16. All documents from the Missouri Public Service Commission pertaining to the Missouri Public Service Commission's Cold Whether Rule.
17. All documents pertaining to the Missouri Public Service Commission's Hot Whether Rule.

18. All documents from the Missouri Public Service Commission listing the supervisory staff within the Customer Service Department with the Missouri Public Service Commission first and last names and positions.
19. All documents from the Missouri Public Service Commission listing the various steps within the due process system outlined with the Missouri Public Service Commission.
20. All documents from the Missouri Public Service Commission outlining the personnel involved with Ameren Missouri and the elderly, disabled, and the indigent.

DOUMENTS FROM UNION ELECTRIC COMPANY OR AMEREN MISSOURI

The documents requested from Ameren Missouri are as follows:

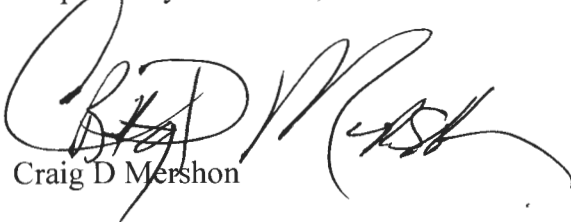
1. All tariffs regarding the operation of Ameren Missouri for the benefit of the customers in St. Louis Missouri.
2. All tariffs regarding the rules and regulations outlining the treatment of the indigent.
3. All tariffs regarding the treatment of people with disabilities in general.
4. All tariffs regarding the treatment of African Americans.
5. All tariffs regarding the people with disabilities who use electric motorized equipment to sustain their lives.
6. All tariffs outlining the amount of Dollar More the company uses to assist customers.

- a. 7 All tariffs outlining positive interaction with customers.
7. All tariffs outlining the due process system within the Customer Service Department.
8. All tariffs outlining the due process system within the Administrative Level above the Customer Service Department.
9. A list of customer service representatives within Ameren Missouri and their supervisors.
10. A list of the regulations regarding the Cold Weather Rule.
11. A list of the regulations regarding the Hot Weather Rule.
12. A copy of the yellow disconnection notice.
13. A copy of the red disconnection notice.
14. A list of exceptions involving the Cold Weather Rule.
15. A list of exceptions involving the Hot Weather Rule.
16. A list of procedures the company uses to assist customers who have huge utility bills.
17. A list of the reasons why if there is an outage the company is unsure if they can assist those with disabilities to be restored immediately.
18. A list of reasons why the administration is not involved in the due process system and why they will not take any action.
19. A list of the reasons why utility does not assist those with disabilities and the indigent in paying their utility bills.
20. A list of the reasons why the utility company charges people with disabilities, the indigent and the elderly with high utility bills.

21. A list of steps the company plans to take in improving Customer Service Department.
22. A list of steps the company plans to take in improving relationships between the African-American community.
23. A list of steps the company plans to take in improving relationships among the elderly.
24. A list of steps the company plans to take in improving relationships among the indigent.
25. A list the steps the company plans to take in improving relationships among people with disabilities.
26. A list of steps the company plans to take to improve relationships among the community.

This document is completed to the best of Mr. Mershon's ability at this time further documents or for 10 days to 20 days are allowed for a response by the Respondent to reply to a discovery pleading such as this one.

Respectively submitted,



Craig D Mershon