

EC-2023-0395

Brett Felber  
VS  
Ameren Missouri

### Complainants Motion to Compel

Complainant comes before the Commission and the Honorable Judge Clark to request that Ameren be forced to compel data requests that they have failed to produce or give to the complainant.

1) The first data request that Ameren failed to produce or give any articles or documentation surrounds June 15, 2023, in which Ameren illegally trespassed private property owned by the [REDACTED]. Ameren trespassed their property illegally in avoidance of following State laws and parking their vehicles on the street in front of the fields. Ameren Missouri didn't obtain consent, authorization or seek approval before illegally trespassing private property owned by the Hazelwood School District.

In addition, Ameren allowed a private sub-contractor outside of Ameren to drive their own personal vehicle, without soliciting a proper identification marking on their vehicle and identification holding of the company he performs services with. The second technician did not have proper insurances required by State law to be there, trespass the property or proper liability insurances and workmans company policy as required by State law for sub-contractors.

( This will show a foundation basis that Ameren has used illegal tactics and broke State laws )

2) Please admit that Ameren failed to follow disconnection protocol and that the disconnection was illegal as Ameren had a payment agreement date of May 22, 2023 and a disconnect letter was mailed or sent into circulation on May 19, 2023.

( I believe the respondent is in fact in possession of these copies, however, they don't want to produce these documents, as they would show the complainant is in fact correct in this matter and the disconnection was illegal and services should be restored immediately.)

In fact Ameren has a history of illegal practices, whether against businesses of mine or personal accounts. Respondents counsel brought up in a request sent to me on July 13, 2023 for Ameren's Data Request EC-2022-0148.

Let me tell you a little background of that. That was Doggie Design Team Pet Grooming & Services Corporation vs Ameren. In which a lawsuit was filed for damages that Ameren did to the premises involved in their illegal disconnection of services.

Last year prior to filing a formal complaint, Ameren Missouri failed to leave a door tag, which the PSC (informal complaint side ordered services be restored and Ameren complied, in addition, Ameren also had to reduce charges for “deposits” that they illegally charged the business and failed to. The case is still pending in [REDACTED] [REDACTED] for service to Ameren on torts.

Again, following that illegal disconnection of services, Ameren almost two and a half weeks later Ameren performed another illegal disconnection of services, in which we mutually agreed to resolve the issue, as Ameren Missouri failed to send out the proper notice of a 10-day letter, this is also where the damage was done, which essentially resulted in a lawsuit being filed out of [REDACTED] for torts.

The whole patten betwee these complaints is a pure revenge by Ameren, they have a same history of repeating pattern and this will prove that Ameren has a history and foundation of not following proper protocols, State laws, Commission rules and regulations and tariffs on accounts of mine. in addition, committing property damages to premises.

Ameren’s history is failing to follow tariffs, regulations, State and Federal laws, then when they get pointed out, they make an absurd claim that they are “threatened” because I file a complaint with the AG’s office or with the PSC.

Whearas, the complainant prays the Commission and the Honorable Judge Clark will order Ameren to compel these requests which crucially show that Ameren has a repeated history of illegally disconnecting services and failing to follow State and Federal laws along with rules, regulations and tariffs.

Respectfully Submitted,  
Brett Felber