

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

Brett Felber and Lisa Lambert,)	
)	
Complainants,)	
v.)	
)	<u>File No. EC-2024-0145</u>
Union Electric Company d/b/a)	
Ameren Missouri,)	
)	
Respondent.)	

**NOTICE OF DEFICIENCY
AND ORDER DIRECTING FILING**

Issue Date: November 2, 2023

Effective Date: November 2, 2023

On October 30, 2023, Brett Felber and Lisa Lambert (jointly referred to as “Complainants”) filed a complaint against Union Electric Company d/b/a Ameren Missouri. Complainants alleged 29 enumerated paragraphs of “facts” that they stated they intend to prove are violations of statutes, tariffs, Commission regulations, and other state and federal laws. Complainants request as relief:

- Ameren Missouri be deregulated and be owned by its customers;
- Ameren Missouri be ordered to change numerous of their outdated policies and refile “new agreements between the Commission and the utility provider”;¹
- Ameren Missouri be required to refund taxpayers and customers monies allegedly used fraudulently for Rush Island federal compliance and St. Charles County well clean-up, and to refund alleged overbilling;
- Ameren Missouri be required to use “their own funding”² for upgrades of the power grid in St. Louis and surrounding areas to provide safe and adequate service;

¹ Complaint (filed October 30, 2023), Attachment, page 4.

² Complaint (filed October 30, 2023), Attachment, page 4.

- The Commission allow competition of utility providers in the greater St. Louis area; and
- Ameren Missouri be ordered to refund \$62.3 billion to customers.

Section 386.390, RSMo, states that a complaint may be made to the Commission by any person:

setting forth any act or thing done or omitted to be done by any . . . public utility in violation, or claimed to be in violation, of any provision of law subject to the commission's authority, of any rule promulgated by the commission, of any utility tariff, or of any order or decision of the commission; provided, that no complaint shall be entertained by the commission, except upon its own motion, as to the reasonableness of any rates or charges of any gas, electrical, water, sewer, or telephone corporation, unless the same be signed by the public counsel or the mayor or the president or chairman of the board of aldermen or a majority of the council, commission or other legislative body of any city, town, village or county, within which the alleged violation occurred, or not less than twenty-five consumers or purchasers, or prospective consumers or purchasers, of such gas, electricity, water, sewer or telephone service. (Emphasis added.)

Commission Rule 20 CSR 4240-2.070(4) sets out what is required in a formal complaint filed with the Commission. The Complainants' filing has not complied with the regulation and is deficient. The Complainants have not provided the following requirements of Commission Rule 20 CSR 4240-2.070(4):

(D) The nature of the complaint and the complainant's interest in the complaint, in a clear and concise manner;

* * *

(F) A statement as to whether the complainant has directly contacted the person, corporation, or public utility about which complaint is being made;

(G) The jurisdiction of the commission over the subject matter of [each allegation in] the complaint;

Because the complaint is deficient, the Commission will not take action regarding this complaint until the deficiencies are corrected. Once the additional information is

provided, the Commission will issue a notice giving Ameren Missouri 30 days in which to respond. If the Complainants do not provide the necessary information by the date set out below, the Commission may dismiss the complaint without making a decision about the allegations.

THE COMMISSION ORDERS THAT:

1. As set out in the body of this notice and order, if Complainants wish to pursue this complaint, they shall provide the information required by Commission Rule 20 CSR 4240-2.070(4) no later than November 30, 2023.
2. If the deficiencies in the complaint are not corrected, the Commission may dismiss this complaint.
3. This order shall be effective when issued.



BY THE COMMISSION

A handwritten signature in black ink that reads "Nancy Dippell".

Nancy Dippell
Secretary

Nancy Dippell, Chief Regulatory Law Judge,
by delegation of authority pursuant to
Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 2nd day of November, 2023.

FORMAL COMPLAINT FORM

Attach extra pages as necessary.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Brett Felber & Lisa Lambert
(Your name here)

Complainant,

v.

File No.

Ameren Missouri

(PSC fills this in)

DBA Union Electric Company
(Utility's name here)

Respondent,

FORMAL COMPLAINT

1. Complainant resides at:

[Redacted]
(Address of complainant)

[Redacted]
(City) (State) (Zip Code)

2. The utility service complained of was received at:

- a. Complainant's address listed in paragraph 1.
- b. A different address:

[Redacted]
(Address where service is provided, if different from Complainant's address)

[Redacted]
(City) (State) (Zip Code)

3. Respondent's address is:

1906 Chouteau Ave
(Address of complainant)

St Louis MO 63103
(City) (State) (Zip Code)

4. Respondent is a public utility under the jurisdiction of the Missouri Public Service Commission.

5. The amount at issue is: \$ [REDACTED]
(If your complaint is about money state how much is in dispute here.)

6. Complainant now requests the following relief:

(Explain what you want the Commission to do: the specific results you are seeking in this complaint.)

Ameren Missouri improperly bills Missouri residents two days per month on monthly statements and tax adjustments. Ameren Missouri has used Federal and State grant and bond funds to pay its Board Members, CEO, Executives and legal counsel, instead of utilizing funds toward a failing grid, junk fees and double dipping fees w/o clarification of itemization and explanation of charges on Missouri customer bills. Failure and loose practices and failure to allow customers to dispute bills, mishandling and failure to utilize medical hardship program - Improper handling of medical hardship documents, etc.

7. The relief requested is appropriate because Respondent has violated a

statute, tariff, or Commission regulation or order, as follows:

(Explain why the Commission should grant the relief you seek: the facts that constitute a violation of a statute, tariff, or Commission regulation or order.)

At this point, this complaint plans to address the numerous violations, statutes, tariffs, Commission regulations, tariffs, state and federal laws that constitute violation.
See attached letter

8. The Complainant has taken the following steps to present this matter to the Respondent:

(Please describe in detail what steps you have already taken to resolve this complaint.)

Ameren Missouri will obviously deny all material in the basis of the complaint. However, upon conclusion of the matter, evidence will prove that Ameren Missouri has misused, abused funds they've requested to mislead several agencies to be used toward grid expansions and upgrades to fund the luxurious lifestyle of those Board members, executives, lobbyist Commission members and counsel. In addition Missouri customers are paying for Ameren's failures to maintain Push Island and St Charles county well contaminations instead of Ameren Missouri using personal corporation assets to pay for these disasters they created.

They are also fixing their record books to make it look like they have no money while profiting

Date Oct 26, 2023

Signature of Complainant

Complainant's Printed Full Name

Alternate Contact Number

Attach additional pages, as necessary. Attach copies of any supporting documentation. Do not send originals of any supporting documentation.

PUBLIC

Brett Felber
VS
Ameren Missouri
Union Electric Company

FILED
October 30, 2023
Data Center
Missouri Public
Service Commission

1) Complainant will prove this this complaint that Ameren Missouri monthly overbills all Missouri residents in their billing by two days, plus additional taxes per month.

2) Complainant will prove in this complaint that Ameren Missouri adds double dipping charges along with junk fees such as so called "hybrid billing" in which they don't clarify and mislead customers and fail to disclose on consumers bills.

3) Complainant will prove in this complaint that Ameren Missouri uses rogue and deceptive practices in billing disputes, in addition fails to clarify how the customer and the utility provider come to mutual agreement on billing disputes.

4) Complainant will prove in this complaint that Ameren Missouri uses deceptive practices in illegal disconnections of services, in which violate numerous commission rules, regulations and tariffs, along with misrepresentation and falsely advertising the methods of contact in disconnection of services.

5) Complainant will prove that Ameren Missouri has failed to use taxable monies built into customers monthly statements that are intended to be used towards phase upgrades to the already failing and have funneled those funds towards the lavished lifestyles of the Ameren Board Members, CEO. Executives and legal counsel to fund their outrageous lifestyles.

6) Complainant will prove in this complaint that Ameren Missouri has failed to maintain proper grid infrastructure of the area and instead of fixing their already broken area's are utilizing phase money intended to repair damages to the already existing structure are slushing the funds to project towards a approach of "cleaner energy" and 'going green."

7) Complainant will prove in this complaint that Ameren Missouri is using taxpayer monies instead of their own personal corporations money to fund the projects in keeping Rush Island in Compliance with the DOJ report. In fact instead of Ameren Missouri admitting failed responsibility on the Rush Island debris, they blame it on customers and taxpayers and screw the taxpayers out of hard earned funds, therefore Ameren can utilize to profit and make major profits.

8) Complainant will prove that Ameren Missouri is making taxpayers in St . Charles County fund the cleanup efforts for the pumping of carcinogens underground, instead of Ameren Missouri admitting responsibility and utilizing their own monies to cleanup contaminated area's, in which customers see higher bills.

9) Complainant will prove that Ameren Missouri fails to utilize their so called "medical hardship" programs to numerous customers, in fact Ameren collects

protected health data records in which Ameren Missouri doesn't have a complaint HIPAA database server to store medical data in an imposed data breach.

10) Complainant will prove that Ameren Missouri's medical hardship program is in fact a scam and a way to receive protected health data from customers and fail to utilize a program, especially for our elderly, disabled and senior citizens and in which Ameren doesn't have a protected layer in place to safeguard data.

11) Complainant will prove that Ameren Missouri in general billing ledger in non-complaint and additional fees built into customers monthly bills aren't clarified or labeled for the fees.

12) Complainant will prove that Ameren Missouri's monthly fee to be a customer of Ameren is illegal and cannot be charges in justification of a monopoly earning company. Usually the fee would be allowed, however since there is no other utility provider in the Missouri, St.Louis area Ameren cannot impose or require the fee.

13) Complainant will prove that Ameren Missouri isn't utilizing their grants and bonds towards the necessary infrastructure that is in place in the greater St.Louis region and is using monies to fund the lavished lifestyle of board members, CEO's, executives, legal counsel.

14) Complainant will prove in this complaint that Ameren Missouri most recently in a filing that they rely on a certain credit, as their bank account is depleted and they have no funds, that they are skewing their numbers, therefore they can tap into additional grant funds and Federal and State level, even though their bank account states different and they are a total profit company of [REDACTED].

15) Complainant will prove that essentially, customers of Ameren Missouri are paying for the failed regulation and overseen of Rush Island and the carcinogens pumped underground in St.Charles and customers are funding the bad business practices of a monopoly utility company that fails to take responsibility and wants to increase consumer bills, instead of Ameren using money out of their cash reserves to fund their bad business practices.

16) Complainant will prove that Ameren Missouri, nor does Ameren Missouri own the essential newly installed smart meters that they have forced onto residents and that Ameren Missouri didn't have to pay a dime for the smart meters and customers paid for the expansion of smart meters.

17) Complainant will prove that the customers of Missouri actually own the newly installed smart meters, as it was a project paid and funded by customers, not the investor owned company Ameren. in fact many utility materials Ameren Missouri doesn't have to pay for and can be passed off to be paid for by the customers.

18) Complainant will prove that the customers of Missouri should have dashboard access in real time to see the advanced of the smart meters, known as the backlog to see actual usage.

19) Complainant will prove that Ameren Missouri's smart reader savings programs are not of benefit, but are actually charging more to customers, instead of seeing "savings," in fact customers have seen over a 300% increase in bills since the smart meters have been installed.

20) Complainant will prove that Ameren Missouri has a representative that can skew the numbers or falsify the numbers and their legal counsel has knowledge of that specialist that works for Ameren Missouri, as she has admitted during a hearing in another matter that she "altered documents because it was easy!"

21) Complainant will prove that the informal complaint process is more less non-beneficial to anyone that files a complaint as majority of the informal PSC member repeat exactly what Ameren representatives state.

22) Complainant will prove that Ameren Missouri fails to turn over necessary paperwork to customer engaged in a billing dispute and rather asks for customer to turn over any and all records, but Ameren is allowed to deny and even in informal complaints.

23) Complainant will prove that in order for a customer to get a copy of complaint materials in an informal complaint they must apply for a Sunshine Request, in which can take a while to process.

24) Complainant will prove that majority of the PSC members are friends with numerous members of the Commission and PSC Staff, in which can create a conflict of interest and mislead the public and create a favorable outcome that favors the utility provider over the Complainant.

25) Complainant will prove that in some matters and to psuh through bonds and grants, imposed rate increases that Ameren Missouri makes backdoor deals not only with certain lobbyist's, but Commission members therefore , they will give a favorable outcome towards approving the deal.

26) Complainant will prove in this complaint that the Commission knowingly has allowed Ameren to impose these fraudulent matters, however at the expense of customers and taxpayers is covering up a lot of these matters for funding purposes.

27) The Complainant will prove that the Commisison and Staff, informal or formal fail to justif to see that customers and taxpayers ensure quality, safe and reliable services and aren't being burden by the utility company.

28) The Complainant will prove that the Commission and Staff, informal or formal, fail to ensure the proper billing of customers over the utility company and usually in essence agree with the provider over the consumer.

29) Complainant will prove that Ameren Missouri fails to inform customers of the process of how to file a informal or formal complaint when approaching a dispute.

Complainant plans to prove all 29 said facts attached to this complaint a looks out for the benefit of the customers and taxpayers in Missouri. Upon conclusion of this matter. Ameren Missouri should be forced to deregulate themselves as a for profit company and investor owned, and be forced to be owned by the customers. Ameren Missouri should be forced to change numerous of their outdated policies and refile new with agreements between the PSC and the utility provider. Should be required to pay taxpayers and customers back all monies for fraudulent use towards Rush Island and St.Charles County carcinogen pumping in rebated of check or credits on bills, along with overages of billing and taxes. In addition, Ameren Missouri should also be required to use their own funding to upgrade the already failed stages of the power grids in St.Louis and surrounding areas to provide safe and reliable electric services that they are charging customers for.

In addition, Complainant seeks that the Commisison allows for the competition of utility providers and for outside utility providers to seek access to coming into the greater St.Louis area and engaging in competition, as taxpayers have paid for all grid upgrades and advancements, meters, etc, and the utility provider, Ameren Missouri has failed to utilize their own funds to put towards advancements.

Complainant seeks that Ameren Missouri is held responsible and ordered to pay \$ [REDACTED] to customer refunds for wrongful billing, utilizing Federal and State funding to pay for the lavished lifesytlles of Ameren's Corporate employees and Board members. Failure to maintain a safe and reliable grid. Illegal disconnections of services to numerous customers in the greater St.Louis region. Misrepresentation of programs they offer to profit, over and collecting protected medical documentation., in the act. Charging customers for failed projects such as Rush Island and St.Charles County water well cleanup fees, etc.

Respectfully Submitted,
Brett Felber

[REDACTED]

[REDACTED]

[REDACTED]



STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 2nd day of November 2023.



Nancy Dippell

Nancy Dippell
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

November 2, 2023

File/Case No. EC-2024-0145

MO PSC Staff
Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel
(OPC)
Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@opc.mo.gov

Brett Felber
Brett Felber
316 Sonderen Street
O'Fallon, MO 63366
bfeber14@gmail.com

Lisa Lambert
Lisa Lambert
2865 Dividend Park Dr
Florissant, MO 63031
bl5856@hotmail.com

MO PSC Staff
Travis Pringle
200 Madison Street
Jefferson City, MO 65101
travis.pringle@psc.mo.gov

Union Electric Company
Legal Department
1901 Chouteau Avenue
P.O. Box 66149, Mail Code
1310
St. Louis, MO 63103
amerenmoservice@ameren.com

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,



**Nancy Dippell
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.