

EC-2024-0217

Brett Felber
VS
Ameren Missouri

Motion for Default Judgment

Complainant files this motion before the Regulatory Judge and the Commission to grant Complainants Motion for Default Judgment against the Respondent, Ameren Missouri for failure to timely file a response within the allocated 30 days from the date of the Complainants complaint.

The Respondent, Ameren Missouri has failed to file or serve an affirmative defense to the Complainant or file through EFIS their affirmative defenses. In addition failure to respond to the Complaint demonstrates a pattern in which the Respondent that they don't challenge or disagree and agree with the formal complaint that was filed against Ameren Missouri on January 25, 2024.

Complainant has further demonstrated in his complaint a serious foundation which shows factual statements in which Ameren Missouri has violated numerous rules, regulations, tariffs, State and Federal Statutes.

Complainant should be granted a motion hearing on this matter and prays that the Regulatory Judge and the Commission at that time of hearing grants Complainants Motion and finds the Respondent in default.

In the even that the Respondent files their affirmative answers and defense after this Motion is filed, it will show the only reason that Ameren has rushed to file a response, is to further more impede the Complainant of their Complaint and will demonstrate that they only filed a response in which to try and state they filed their affirmative answers and defenses , after the fact.

Respondents affirmative answers and defenses should only be heard, after the Complainants Motion for Default Judgment is heard and ruled on, otherwise it should be immediately quashed.

Complainant is entitled the specific reliefs addressed in the formal complaint filed on January 25, 2024.

Respectfully Submitted,
Brett Felber
2/23/2024
4:11 pm

