

EC-2024-0217

Brett Felber  
VS  
Ameren Missouri

Motion for Default Judgment & Motion to Quash

Complainant files Motion for Default Judgment and Motion to Quash Respondents affirmative answers and defenses.

Ameren Missouri's affirmative defenses and answers do not address, cite or raise a single statute or name a rule, regulation or tariff that goes against the Complainants claim.

In fact, Respondent decides to talk about the unjust enrichment, extortion methods and the facts that their Regulatory team that setup the new account, failed to inform Mr. Felber at any time, prior to the mailing of the deposit that he would see a deposit or be billed a deposit on the sequence of his first six bills. Nor in their answers do they talk or elaborate about the customer charges or raise any awareness around it.

Again, Respondent feels they can interject or substitute policies as they go to benefit them. Ameren policies in which they decide to substitute or install at they go enriches them to benefit off each and every complaint and customer. When signing up for utility services it is required by law and under FTC's laws that the utility provider inform the customer of any deposits being assessed to their bills. The letter that they send or provide serves as an overcap or understanding to the deposit, not as a "notification" as Respondent wishes to call it. Ameren Missouri with no announcement to Mr. Felber or exchanges with the Regulatory Department, who by the way decides and assesses these "deposits" at no time prior to the setup of the account or when services were established informed or notified Mr. Felber or the Complainant of the deposit being assessed, therefore, Mr. Felber was shocked and surprised to the fact.

Respondents answers are again a mere excuse in the billing of the account. It is always and excuse with this predatory utility company. The reason they are predatory, is they go against every Statute whether Federal or State rule, regulation and tariff. Ameren simply practices predatory methods in which the benefit and gain unjust enrichment against the Complainant.

Simply as stated in the prior Motion for Default Judgment. The Complainant was correct and the Respondent only filed their affirmative answers and defenses, after the Complainant pointed this out.

The Complainants Motion for Default Judgment & Quash should be heard prior to Ameren's affirmative and defenses being allowed. Allowing Ameren's affirmative answers and defense to stand would be allowing the Respondent to clearly violate all the Complainants listed issues of the complaint and allowing the Respondent to breach all State, Federal Statutes and rules, regulations and tariffs. As the Respondent also failed to list off any State or Federal Statutes or rules, regulations and tariffs

The Complainant prays that their Motion for Default Judgment is granted and in addition the Respondents filing is quashed.

Respectfully Submitted,  
Brett Felber  
2/22/24  
5:08 pm



