

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

Missouri Coalition for Fair Competition )  
and Corey Malone, )  
 )  
Complainants, )  
 )  
v. )  
 )  
Union Electric Company d/b/a )  
Ameren Missouri, )  
 )  
Respondent. )

**File No. EC-2023-0037**

**STAFF’S STATEMENT OF POSITIONS**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Statement of Positions* states as follows:

1. Does the evidence establish that Ameren Missouri (“Ameren”) has engaged in HVAC services in a manner that violates Section 386.756? If the answer is “yes,” what actions, if any, should the Commission take?

a. No. Insufficient evidence exists to show that Ameren has engaged in providing HVAC services in a manner that violates § 386.756, RSMo. Based on Staff’s review of information provided by the parties, Staff’s investigation did not find violations by Ameren of any applicable statutes, Commission rules or regulations, or Commission approved tariffs.

**WHEREFORE**, the Staff respectfully submits its *Statement of Positions* in this case for the Commission’s consideration.

Respectfully submitted,

**/s/ Carolyn H. Kerr**

Missouri Bar # 45718

Senior Staff Counsel

Missouri Public Service Commission

P.O. Box 360

Jefferson City, MO 65102

573-751-5397 (Voice)

573-526-6969 (Fax)

[Carolyn.kerr@psc.mo.gov](mailto:Carolyn.kerr@psc.mo.gov)

Attorney for Staff of the

Missouri Public Service Commission

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 9<sup>th</sup> day of July, 2024, to all counsel of record.

**/s/ Carolyn H. Kerr**