

EC-2025-0165

Complainants Motion for Default Judgment & Motion to Compel

- 1) Complainant filed a complaint with the Commission on November 20, 2024
- 2) Ameren Missouri made an entry of appearance on November 21, 2024
- 3) The Commission ordered Ameren Missouri to file an answer within 30 days on November 21, 2024
- 4) Ameren Missouri's answer was due on December 20, 2024
- 5) Ameren Missouri did not file a timely answer in accordance with Missouri Public Service Commission rules, regulations and tariffs.
- 6) In addition, Ameren Missouri was made aware of discovery documents that Mr. Felber made Ameren aware of that would agree in accordance that Ameren Missouri did in fact commit a violation under Missouri Public Service Commission, rules and regulations, sections settlement and payment agreements, and disconnect notices.
- 7) All documents attached show Ameren Missouri is in clear violation of Missouri Public Service Commission rules and regulation, settlements & agreements, disconnections.
- 8) Ameren Missouri hasn't filed any pleadings or asking for an extension of time to file an answer.
- 9) Ameren Missouri's filing if late, should not get due process first over Mr. Felber's Motion for Default Judgment and Motion to Compel.

Whereas, the complainant prays that the Commission will find the Respondent, Ameren Missouri in default and issue a default judgment against Ameren Missouri. In the event that Ameren does file a answer, then the Complainant moves for the Complainants Motion for Default Judgment and Motion to Compel are granted and heard first, and Ameren Missouri's filing be subject to further answering of why they filed a late response and should subsequently only be looked at after the Commission rules on the Complainants two Motions first.

Respectfully Submitted,
Brett Felber

12/21/2024