

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

Brett Felber,	)	
	)	
Complainant,	)	
	)	
v.	)	<b><u>File No. EC-2025-0165</u></b>
	)	
Union Electric Company d/b/a Ameren	)	
Missouri,	)	
	)	
Respondent.	)	

**AMEREN MISSOURI'S ANSWER  
TO AMENDED COMPLAINT**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), by and through the undersigned counsel, and for its *Answer to Amended Complaint* respectfully states to the Missouri Public Service Commission ("Commission") as follows:

Background

1. On November 20, 2024, Complainant filed a complaint with the Commission.
2. On November 21, 2024, the Commission issued its *Order Giving Notice of Case Filing, Directing Complainant to Respond, Directing An Answer, A Staff Investigation, And to Cease Disconnection Or Restore Service* ("Order"). The Commission's *Order* directed Ameren Missouri to file an answer to the Complaint no later than December 23, 2024.
3. On November 27, 2024, the Complainant filed an Amended Complaint. Allegations contained in the Complaint but not realleged in the Amended Complaint are deemed abandoned. Ameren Missouri is filing its answer to the Amended Complaint.

Answer to Amended Complaint

4. Ameren Missouri denies the allegations contained in paragraph 1.



18. Ameren Missouri denies the allegations contained in paragraph 15.

19. Ameren Missouri admits that it \*\* [REDACTED]

[REDACTED] \*\* To the extent paragraph 16 contains any other allegations, Ameren Missouri denies the same.

20. Ameren Missouri denies the allegations contained in paragraph 17.

Grounds of Defense

21. The Commission issued its *Report and Order* in EC-2023-0395 on November 29, 2023. The Report and Order made findings of fact and conclusions of law regarding some of the assertions in the Amended Complaint. The Complainant did not properly appeal the *Report and Order* in EC-2023-0395 and it became final. The Complainant's attempt to relitigate issues from EC-2023-0395 in this matter is improper and should be dismissed.

22. \*\* [REDACTED]

[REDACTED] \*\* The Commission is a regulatory body of limited jurisdiction having only such powers as are conferred by statute and cannot order damages or grant equitable relief. *See e.g., State ex. rel. GS Technologies Operating Co., Inc. v. Public Service Comm'n*, 116 S.W.3d 680, 695 (Mo. App. 2003); *American Petroleum Exchange v. Public Service Comm'n*, 172 S.W.2d 952, 956 (Mo. 1943). \*\* [REDACTED] \*\* are not within the Commission's authority to grant.

23. \*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*

24. \*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*

25. While a payment agreement is in PENDING status, normal collection activity on accounts will continue. Billing alerts will continue to be generated, including payment date reminders and disconnection notices. Until a payment agreement becomes ACTIVE with the down payment, the billing system recognizes that the entire balance on the account is due.

26. \*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*

**WHEREFORE**, Ameren Missouri requests the Commission set this matter for hearing as to whether the Company violated any Commission statute, rule, order or approved tariff and deny Complainant's request for relief.

Respectfully submitted,

/s/Jennifer L. Hernandez  
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**ATTORNEY FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been emailed to the parties of record on  
this 23<sup>rd</sup> day of December 2024.

**/s/ Jennifer L. Hernandez**