

EC-2023-0395

Brett Felber
Vs
Ameren Missouri

Complainants Motion for Immediate Restoration of Services

- 1) Complainant has filed numerous motions for restoration of services that have gone unattended, nor have been heard or ruled by the Commission or the Honorable Judge Clark.
- 2) Complainant will underly that Ameren Missouri regardless of the discrepancy of which date the payment agreement was for Ameren claims May 18, 2023 was the cutoff date and Complainant has submitted which shows May 22, 2023.
- 3) Complainant submits a copy of the Partial Stipulations approved by the Commission on May 28, 2020 and the Supplemental Application for Variances related to disconnections and reconnections.
- 4) These are stipulations which follow the series of disconnections underlined and agreed to by Ameren Missouri, Paula Johnson (Senior Corporate Counsel), Banks Law LLC, [REDACTED] Staff Of the Missouri Public Service Commission and John Coffman, (Attorney for AArp and the Consumer Council.
- 5) These are stipulations in which where approved by the Commission for the disconnection and reconnection of services for customers who have AMI meters, non cold weather rule, cold wether rule and MER.
- 6) Complainant is going to focus the attention of non cold weather rule and Variance 20 CSR 4240-13.050 (9).
- 7) This variance discusses Door Hangers/Contact During Non-Cold Weather Rule Periods.
- 8) This variance doesn't exclude AMI meters from not following the variance as the sitpulation approved would still require Ameren Missouri to follow the variance.
- 9) Variance :20 CSR 4240-13.050 (9) states " Immediately proceeding the discontinuance of service, the employeef of the utility designated to perform this function, expect where safety of the employee is endagered, shall make a reasonable effort to contact and identiofy him/herself to the customer responsbile person then upon the premises and shall announce the purpose of his/her presence. When service is discontinued , the employee shall leave a notice upon the premises in a manner conspicuous to the customer that services has been discontinued and the address and telephone number of the utility where the customer may arrange to have service restored.
- 10) The revision Tariff Sheet No 143 is the same compound that must be followed.
- 11) The revision Tariff Sheet No 144 is the same compound that must be followed.
- 12) The Unanimous Stipulation and Agreement, doesn't exlcuded AMI meters from excluding the same Door Tag Policies, in fact , AMI meters are subject still to those policies.
- 13) On May 19, 2023, Ameren Missouri disconnected utility services to the premises in question of the Complaint.
- 14) On May 19, 2023, Ameren Missouri failed to follow the Unanimous Stipulation and Agreement that they setforth the the Commission and was approved

15) Respondent, Ameren Missouri failed to leave a Door Hanger /Contact on the date of May 19, 2023, which would constitute an illegal disconnection.

16) Respondent, Ameren Missouri failed to follow the variance and revisions in informing Complainants services were in jeopardy or out for disconnection of service.

17, Respondent, Ameren Missouri failed to leave a door tag at the premises in question that services had been discontinued and a phone number where Ameren Missouri could be reached to reconnect services.

18) These variances and revisions do not exclude AMI customers and in the policies written, Respondent must still follow this process.

19) Respondent, Ameren Missouri failed to supply or leave a door tag to the premises.

20) Respondent, Ameren Missouri should be ordered and required to restore utility services immediately upon execution of this motion and with the surrounding paperwork for agreement they failed to follow.

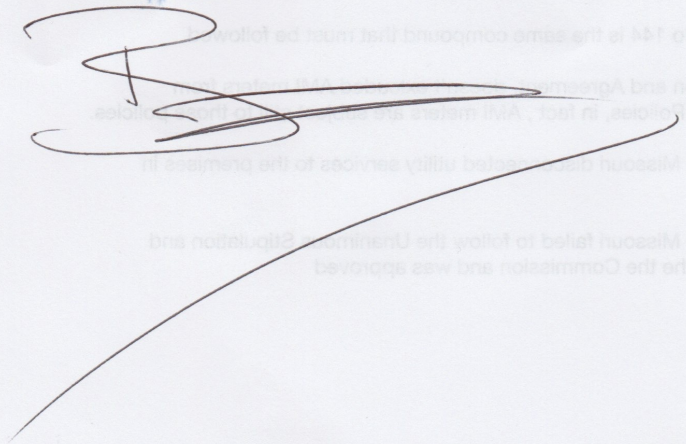
21) Respondent, Ameren Missouri should be ordered to restore services to the Complainants premises in question for failure to follow variance 20 CSR 4240-13.050 (9) , Revision Tariff Sheet No 143, Revision Tariff Sheet No 144.

22) It would be against Commission rules, regulations and tariffs that the Complainants services remained off to a clear violation adopted by the Commission in a filing submitted and agreed to by Ameren Missouri, the Missouri Public Service Commission, Staff and other parties.

Whereas the Complainant submits this motion and asks the Commission and the Honorable Judge Clark set this matter for an immediate hearing no later than Thursday November 9, 2023 or order that the Respondent, Ameren Missouri restore utility services to the premises prior to a hearing being held on this matter for failure to abide by variance 20 CSR 4240-13.050 (9), Revision Tariff Sheet 143 and Tariff Sheet 144, by no later than Thursday November 9, 2023.

The Complainant is entitled to satisfactory working utility services to the premises in question and it would be continued negligence for the Commission or Honorable Judge Clark to allow services to be off , as Ameren failed to follow the proper and agreed agreement terms of their AMI policies.

Respectfully Submitted,
Brett Felber



November 8, 2023