

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

|                                      |   |                                      |
|--------------------------------------|---|--------------------------------------|
| <b>Leah Gay Goessling,</b>           | ) |                                      |
|                                      | ) |                                      |
| <b>Complainant,</b>                  | ) |                                      |
|                                      | ) |                                      |
| <b>vs.</b>                           | ) | <b><u>File No.: EC-2025-0293</u></b> |
|                                      | ) |                                      |
| <b>Union Electric Company, d/b/a</b> | ) |                                      |
| <b>Ameren Missouri,</b>              | ) |                                      |
|                                      | ) |                                      |
| <b>Respondent.</b>                   | ) |                                      |

**UNION ELECTRIC COMPANY, d/b/a AMEREN MISSOURI’S  
REQUEST FOR MEDIATION**

COMES NOW, Union Electric Company d/b/a Ameren Missouri, (“Ameren Missouri” or “Company”) and for its Request for Mediation in the instant case states as follows:

1. On April 22, 2025, Leah Gay Goessling filed a complaint with the Missouri Public Service Commission (“Commission”) against Ameren Missouri.
2. On April 22, 2025, the Commission issued its *Order Giving Notice of Case Filing, Directing an Answer and Directing a Staff Investigation* (“Order”) ordering Ameren Missouri to file an answer to the complaint, a notice of satisfaction of complaint, or a request for mediation no later than May 22, 2025.
3. The Order further states in pertinent part: “Upon receipt of a request for mediation, the 30-day time period shall be tolled while the Commission ascertains whether the Complainant is also willing to submit to voluntary mediation.” Ameren Missouri understands that if the Complainant declines the opportunity to seek mediation, Ameren Missouri will be notified in writing that the tolling has ceased and the date by which an answer or notice of satisfaction must be filed.

4. The Company desires to mediate the complaint and requests that the schedule set forth in the Order be suspended while the Commission ascertains whether the Complainant is agreeable to mediation, and if so, pending mediation.

WHEREFORE, as set forth above, Union Electric Company d/b/a Ameren Missouri respectfully requests mediation in this case and moves the Commission to suspend the schedule set forth in its Order, pending mediation.

Respectfully submitted,

/s/ *Carla Fields Johnson*

**Carla Fields Johnson**, #47149  
Fields & Brown, LLC  
300 East 39<sup>th</sup> Street, Suite 1P  
Kansas City, Missouri 64111  
(816) 474-1700 (phone)  
(816) 421-6239 (facsimile)  
cfields@fieldsandbrown.com

**Jennifer L. Hernandez**, #59814  
Corporate Counsel  
Ameren Missouri  
1901 Chouteau Avenue, MC 1310  
P.O. Box 66149  
St. Louis, MO 63166-6149  
(314) 978-8418 (phone)  
(314) 554-4014 (facsimile)  
jhernandez2@ameren.com  
amerenmoservice@ameren.com

**Attorneys for Union Electric  
Company d/b/a Ameren Missouri**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing was served on the parties on the certified service list via electronic mail on this 1st day of May, 2025.

/s/ *Carla Fields Johnson*