

## Motion for Summary Determination

FILED  
July 27, 2025  
Missouri Public  
Service Commission

Your Honor & Commission. Complainant comes before the Commission asking that the Commission grant Mr. Felber's Motion and find Ameren Missouri in immediate violation of Commission rule 20 CSR4240-13.030, paragraph (D). Deposits and Guarantees of Payment.

Paragraph (D) implies that payment of a disputed bill shall be satisfactory if made within (10) days of resolution or withdrawal of dispute.

- 1) Ameren Missouri illegally shutoff Mr. Felber's electric services for a brief period on July 1, 2025.
- 2) Mr. Felber was in complaint with the utility provider at the time of the shutoff. See Ameren's filing exhibit and communication between Ameren Missouri and the PSC. (Informal)
- 3) PSC, (informal) didn't properly notify, even though Mr. Felber disagreed with [REDACTED], (MOPSC's) resolution, that Mr. Felber would have (10) days, from resolution, to deem payment shall be satisfactory, by this Commission, rule. (Not delinquent until after the 10-day period).

- 4) Mr. Felber immediately filed a formal complaint the SAME day, July 1, 2025. Essentially disagreeing with any decision rendered by the PSC, (informal), disputing their bill for the amount listed in Mr. Felber's Complaint.
- 5) Ameren Missouri, failed to follow rule 20 CSR 4240-13.030, paragraph (D). In (A), by Commission rule giving Mr. Felber the 10 days to make payment and would be deemed satisfactory, and illegally disconnected Mr. Felber's utility services.
- 6) To date, even though Mr. Felber has disputed their bill in the amount of \$1,949.92, Ameren is still trying to collect the amount, when the Commission, hasn't rendered a decision regarding the amount of money in dispute.
- 7) Even, if the Commission did render a decision, (Informal) Ameren Missouri and the PSC, erred on their own rules and regulations, tariffs, and failed to notify Mr. Felber that Mr. Felber under rule and regulation 20 CSR4240-13.030, would have 10 days of the resolution be satisfactory, not delinquent until after the 10 days.

Mr. Felber respectfully asks this Court to grant a Summary Determination on the material facts that can't be disputed by either the PSC, or Ameren Missouri, and failed to inform Mr. Felber or give Mr. Felber the 10 days' required for any satisfactory payment to be made under this rule.

Under this specific rule, it requires that the PSC and Ameren Missouri must follow this designed rule and regulation.

Mr. Felber prays that the Court will grant, Mr. Felber's Motion for Summary Determination. That Ameren Missouri is found in immediate violation of rule and regulation 20CSR 4240-13.030, paragraph (D).

In addition, Mr. Felber, asks the Commission to grant a temporary cease of any disconnections of services to the premises, until Ameren Missouri complies and answers why they illegally shutoff Mr. Felber's utility services, and failed to follow this designated rule and regulation.

In addition, Ameren Missouri to date of violating this rule and regulation, still hasn't properly credited Mr. Felber's account the payments and payment amounts listed in this complaint.

Mr. Felber also be granted a cease order from collecting the amount of \$1,949.92, listed in this complaint, until a Commission decision is rendered in this matter. Plus, after any decision and if the Commission renders a decision, Mr. Felber is given with the appropriate rule and regulation, the 10 days to make satisfactory payment under 20CSR 4240-13.030 paragraph (D) Deposits and

Guarantees of Payment, before any delinquency is imposed, by this rule.

Mr. Felber prays that the Commission grants this Motion and cease orders against Ameren Missouri. As they are material facts, that cannot be argued by the Respondent, Ameren Missouri.

Respectfully Submitted

Brett Felber

7-27-25