

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Case No. EC-2026-0004

BRETT FELBER, Complainant

v.

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI, Respondent

MEMORANDUM TO STAFF OF THE COMMISSION, RESPONDENT, COMMISSIONERS,
AND REGULATORY LAW JUDGE CLARK

Submitted by Complainant Brett Felber

Dated: September 15, 2025

I. Introduction

The Complainant respectfully submits this memorandum to address the continued delay and obstruction in this proceeding. The Commission and Regulatory Law Judge Clark should move this matter directly to an evidentiary hearing.

II. Improper Subpoena

Respondent Ameren Missouri has filed a subpoena that is defective and incorrectly directed, stemming from a failure to properly read the documents and complaints at issue.

III. Statutory and Regulatory Violations

The Complainant has already identified four direct violations of statutes, Commission rules, regulations, and tariffs in prior filings, including:

- Motions to Strike;
- Response to Staff Report;
- First Motion for Summary Judgment; and
- Second Motion for Summary Judgment.

These substantive violations remain unanswered. Instead of addressing these matters directly, the Respondent and Staff continue to avoid discovery obligations and substantive admissions.

IV. Judicial Conduct

The Complainant notes concern that Regulatory Law Judge Clark has, at times, appeared to speak on behalf of Respondent Ameren Missouri and to resist direct statutory arguments raised by the Complainant. Procedural blocking of EFIS access and muting of participation raises additional concerns about fairness in this proceeding.

V. Request for Immediate Ruling

The Complainant respectfully demands that the Commission and Judge Clark:

1. Rule on the pending Motions to Strike, First Motion for Summary Judgment, and Second Motion for Summary Judgment; or
2. Immediately set this case for an evidentiary hearing.

VI. Conclusion

Ameren Missouri, the Commission's Staff, and Judge Clark have failed to directly address clear statutory and regulatory violations identified by the Complainant. Continued delay serves no purpose other than to waste the time of the parties.

Accordingly, the Complainant respectfully requests that the Commission either (1) rule on the pending motions, or (2) set this matter for evidentiary hearing without further delay.

Respectfully submitted,

Brett Felber

Complainant

September 15, 2025

