

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

EC-2026-0004

Brett Felber, Complainant

v.

Ameren Missouri, Respondent

## **MOTION TO DISQUALIFY OR REASSIGN ADMINISTRATIVE LAW JUDGE/COMMISSIONER**

COMES NOW, Complainant Brett Felber, and respectfully moves the Missouri Public Service Commission ("Commission") for the disqualification or reassignment of the Administrative Law Judge/Commissioner currently assigned to this proceeding, pursuant to the authority vested in the Commission under Chapter 386, RSMo and the Commission's rules of practice, 20 CSR 4240-2.010 et seq.

### **I. Grounds for Motion**

1. The Missouri Public Service Commission, while not a court of law, is required to afford all parties the rights of due process, including a fair and impartial hearing.
2. Under Missouri law, an adjudicator must be free from bias, prejudice, or conflict of interest in order to maintain the integrity of the proceeding.
3. Complainant has reason to believe that the current Administrative Law Judge/Commissioner assigned to this matter cannot remain impartial because of demonstrated favoritism towards the utility, Ameren Missouri, and repeated bias against Mr. Felber's filings, including but not limited to dismissive treatment of his motions, refusal to properly consider evidence he has submitted, and a pattern of ruling in a manner that consistently advantages the Respondent utility.
4. The appearance of bias is sufficient to warrant reassignment to preserve public confidence in the fairness of this proceeding.

### **II. Legal Authority**

5. Section 386.500–386.510, RSMo provides that Commission orders must be supported by substantial and competent evidence on the record and must be issued by impartial decision-makers.
6. The Commission has inherent authority to reassign an ALJ or remove a Commissioner from a particular case to ensure the appearance and reality of fairness.
7. Missouri courts have recognized that disqualification is warranted where "a reasonable person would question the impartiality" of the adjudicator.

### **III. Relief Requested**

WHEREFORE, Complainant Brett Felber respectfully requests that the Missouri Public Service Commission:

1. Grant this Motion;
2. Disqualify or reassign the currently assigned Administrative Law Judge/Commissioner; and
3. Appoint a neutral decision-maker to preside over this proceeding in order to ensure fairness and due process.

Respectfully submitted,

Dated: September 15, 2025

/s/ Brett Felber  
Complainant, Pro Se

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Disqualify or Reassign was served upon counsel for Ameren Missouri and upon the Staff of the Missouri Public Service Commission by electronic mail and/or first-class mail, postage prepaid, on this 15th day of September, 2025.

/s/ Brett Felber  
Complainant, Pro Se