

BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION
Jefferson City, Missouri

Case No. EC-2026-0004

BRETT FELBER,
Complainant,

v.

AMEREN MISSOURI,
Respondent.

MOTION TO SUSPEND PROCEEDINGS

Complainant, Brett Felber, respectfully moves the Missouri Public Service Commission (“Commission”) to suspend proceedings in the above-captioned matter until January 2026, and in support thereof states as follows:

I. Grounds for Suspension

1. To date, Respondent Ameren Missouri has failed to respond to Complainant’s discovery requests, as required by Commission rules. Pursuant to 4 CSR 240-2.190 (Discovery) and Section 386.410, RSMo, a party is entitled to discovery relevant to the issues in a pending proceeding. Without proper responses, Complainant is unable to prepare adequately for any hearing, including the scheduled Evidentiary Hearing.
2. Complainant has filed multiple motions—including requests for discovery, motions to strike, and motions for summary judgment—which remain pending before the Commission. These pleadings were served in accordance with 4 CSR 240-2.080(10) (Service of Documents).
3. Despite proper service, Complainant’s motions and discovery requests remain unanswered by Respondent, frustrating the fair resolution of this matter.
4. Under 4 CSR 240-2.190(2) and Section 386.420, RSMo, Complainant is entitled to obtain discovery to ensure due process in Commission proceedings. Respondent’s failure to comply with these requirements undermines the integrity of the proceedings.
5. Certain documents provided to Complainant raised issues of authenticity. Complainant, in his capacity as owner of a data recovery and forensic services business, has a fiduciary and legal obligation to notify federal and local law enforcement of potential counterfeit documents, pursuant to 18 U.S.C. §§ 1001, 1343, and 1344, and Section 570.090, RSMo (Forgery).

[REDACTED]

7. Just as the Commission has a statutory duty to ensure fair regulation, Complainant and his businesses have fiduciary duties to report and act upon tainted or counterfeit documents. This duty is not eclipsed by the pendency of a Commission proceeding.

II. Request for Relief

In light of the foregoing:

- The absence of discovery compliance,
- The pendency of unresolved motions,
- The seriousness of federal and state law enforcement involvement, and
- The fiduciary and statutory duties imposed upon Complainant,

Complainant respectfully moves the Commission to halt and suspend all proceedings in this matter until January 2026.

III. Conclusion

The interests of justice, due process, and Commission integrity require suspension of proceedings until such time as discovery disputes are resolved and parallel federal and state law enforcement actions are clarified.

Respectfully submitted,

Dated: September 17, 2025

Brett Felber
Complainant

[REDACTED]
[REDACTED]
[REDACTED]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Suspend Proceedings was served via electronic mail and/or first-class mail, postage prepaid, this 17th day of September, 2025, to all parties of record, including Ameren Missouri and Staff of the Missouri Public Service Commission.

Brett Felber