Before the Missouri Public Service Commission Case No. EC-2026-0004

Brett Felber (Complainant)

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Ameren Missouri (Respondent)

Motion to Restore EFIS Access and Compel Transparency

Comes now the Complainant, **Brett Felber**, and respectfully moves the Missouri Public Service Commission ("Commission") to immediately restore full EFIS access and compel disclosure of all filings in this matter, and in support thereof states as follows:

1. EFIS Is the Official Filing System

The Missouri PSC's Electronic Filing and Information System (EFIS) is the official docket and filing system for all pleadings, motions, responses, and orders before the Commission.

2. Right to Access Filings

Pursuant to 20 CSR 4240-2.090(1): "All pleadings, briefs, documents, and other papers filed with the commission in a case shall be open to public inspection, except as otherwise provided by law." As a party to this proceeding, the Complainant is entitled to access all filings. Blocking or concealing filings deprives the Complainant of rights guaranteed under Commission rules.

3. Service and Notice Requirements

Pursuant to 20 CSR 4240-2.120(12): "Every document required to be served shall be served upon each party of record in the proceeding." By denying EFIS access, the Commission and/or Respondent are effectively preventing proper service of filings, creating an unlawful procedural imbalance.

4. Due Process Violation

The Commission's denial of EFIS access has prejudiced the Complainant by:

- Preventing timely filing of motions, responses, and discovery requests.
- Preventing review of Respondent's filings.
- Undermining the Complainant's ability to fully participate in the proceeding.

Such actions constitute a denial of due process under Missouri law and the U.S. Constitution.

5. Relief Requested

The Complainant respectfully requests that the Commission:

- 1. Immediately restore full EFIS access to the Complainant in Case No. EC-2026-0004.
- 2. Direct that all prior filings concealed from the Complainant be disclosed forthwith.
- 3. Issue an order affirming that all parties must comply with 20 CSR 4240-2.090 and 20 CSR 4240-2.120, guaranteeing equal access and service to all parties.
- 4. Grant such other relief as may be just and proper.

Respectfully submitted,

Brett Felber

Complainant

September 23, 2025

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Restore EFIS Access and Compel Transparency was served upon all parties of record in this proceeding via the Commission's EFIS system on this 23rd day of September, 2025.

Brett Felber Complainant