

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

FILED
October 2, 2025
Missouri Public
Service Commission

Case No. EC-2026-0004

Brett Felber (Complainant)
v.
Ameren Missouri (Respondent)

Exhibit C

██████████ and ██████████ – Subpoena Policy and Customer Notification Requirements

Overview:

This exhibit outlines the subpoena policies of ██████████ and ██████████, and their obligations under the Missouri Right to Financial Privacy Act (MRFPA) and the California Right to Financial Privacy Act (CRFPA). Both statutes require notice to the customer prior to disclosure of financial records, unless a statutory exception applies.

Key Policy Provisions:

- ██████████ – Requires any civil subpoena for customer financial records to be properly served on its legal compliance department. Customers must be provided notice under the MRFPFA and CRFPA before records are released. Informal requests are not honored.
- ██████████ – Subpoenas must be served at its designated compliance/legal processing office. Customers must receive prior notice and be given the opportunity to object. Compliance is guided by the Right to Financial Privacy Act and state analogues.

Statutory Authorities:

- Missouri Right to Financial Privacy Act (MRFPA) – Mo. Rev. Stat. §§ 408.675–408.700 requires that a copy of any subpoena be served on the customer at or before service upon the financial institution, unless specifically waived by statute.
- California Right to Financial Privacy Act (CRFPA) – Cal. Gov't Code §§ 7460–7473 mandates notice must be served on the customer prior to, or contemporaneous with, subpoena service on the bank, except in narrow statutory exceptions.

Forensic / Procedural Note:

Neither [REDACTED] nor [REDACTED] permit disclosure of financial records based on informal communication. Formal subpoena compliance requires proper service on the bank's compliance office, notice to the customer, and opportunity for the customer to challenge via motion to quash or protective order.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Exhibit C has been filed and served upon all parties of record in this matter before the Missouri Public Service Commission on this date.

Respectfully submitted,

Brett Felber, Complainant