

Vas Construction, LLC,
Complainant,
v.
Union Electric Company d/b/a Ameren
Missouri,
Respondent

² Commission rules governing practice and procedure before the Commission are published in the Code of State Regulations at 20 CSR 4240. Chapter 2. Discovery is specifically addressed at 20 CSR 4240-2.090.

parties in exploring opportunities for settlement. Upon a written request for mediation, the Commission may suspend the deadlines set forth in this order.

THE COMMISSION ORDERS THAT:

1. The Commission's Data Center shall send, by certified mail, a copy of this notice and order and a copy of the complaint to Union Electric Company d/b/a Ameren Missouri at:

ATTN: Legal Department
P.O. Box 66149, Mail Code 1310
1901 Chouteau Avenue
St. Louis, Missouri 63166-6149

2. Ameren Missouri shall file an answer to this complaint or request for mediation no later than April 21, 2021, and serve a copy upon the Complainant.

3. All pleadings (the answer, the notice of satisfaction of complaint or request for mediation) shall be mailed to:

Secretary of the Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102-0360

or filed using the Commission's electronic filing and information service.

4. This order shall be effective when issued.



BY THE COMMISSION

A handwritten signature in black ink that reads "Morris L. Woodruff". The signature is written in a cursive style.

Morris L. Woodruff
Secretary

Charles Hatcher, Regulatory Law Judge,
by delegation of authority pursuant to
Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,
on this 22nd day of March, 2021.

FORMAL COMPLAINT FORM

Attach extra pages as necessary.

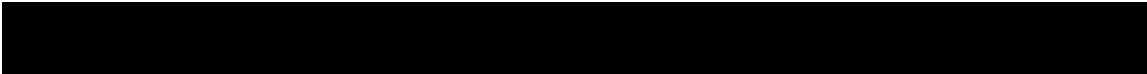
**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

<u>Vas Construction LLC</u>	)	
(Your name here)	)	
	)	
Complainant,	)	
	)	
v.	)	File No.
	)	
<u>Ameren UE</u>	)	
	)	
	)	(PSC fills this in)
(Utility's name here)	)	
	)	
Respondent,	)	

COMPLAINT

1. Complainant resides at:

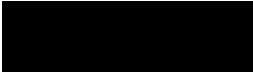

(Address of complainant)

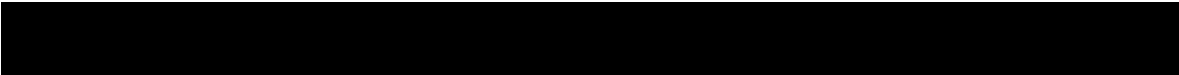

(City) (State) (Zip Code)

2. The utility service complained of was received at: 2107 S Grand Blvd

a. Complainant's address listed in paragraph 1.

b. A different address:


(Address where service is provided, if different from Complainant's address)


(City) (State) (Zip Code)

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3. Respondent's address is:

Ameren UE, PO Box 88068

(Address of complainant)

Chicago

(City)

IL

(State)

60680

(Zip Code)

4. Respondent is a public utility under the jurisdiction of the Missouri Public Service Commission.

5. The amount at issue is: \$

(If your complaint is about money state how much is in dispute here.)

6. Complainant now requests the following relief:

(Explain what you want the Commission to do: the specific results you are seeking in this complaint.)

Based on a corporate guaranty that we have signed with Ameren UE in 2017 without having any expiration date, that Ameren UE will waive
the deposits if assessed on any of our accounts providing that the total current balance owed on all accounts is limited to \$50K.

7. The relief requested is appropriate because Respondent has violated a statute, tariff, or Commission regulation or order, as follows:

(Explain why the Commission should grant the relief you seek: the facts that constitute a violation of a statute, tariff, or Commission regulation or order.)

Not following the terms stated in the corporate guaranty, and Ameren UE claims the agreement is expired where it has not expiration date.

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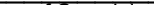
8. The Complainant has taken the following steps to present this matter to the Respondent:

(Please describe in detail what steps you have already taken to resolve this complaint.)

[illegible]

3-18-2021

Date


Signature of Complainant

Complainant's Phone Number

Ira Berkowitz, Attorney for Vas Construction LLC
Complainant's Printed Full Name

Alternate Contact Number

Complainant's E-mail Address

*Attach additional pages, as necessary. Attach **copies** of any supporting documentation. Do **not** send **originals** of any supporting documentation.*

PUBLIC



Missouri Public Service Commission

WILLIAM P. KENNEY
Commissioner

RYAN A. SILVEY
Chairman

SCOTT T. RUPP
Commissioner

MAIDA J. COLEMAN
Commissioner

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://psc.mo.gov>

JASON R. HOLSMAN
Commissioner

Information Sheet Regarding Mediation of Commission Formal Complaint Cases

Mediation is a process where the parties work together to try to resolve their dispute with the aid of a neutral party, the mediator. The mediator's role is help the parties talk to each other. The mediator may offer suggested solutions, but the mediator has no authority to tell the parties what they must do or to determine who "wins." Instead, the mediator simply works with both parties to help them reach an agreement.

Typically, at a mediation session the parties meet for an off-the-record discussion. The mediation session is not a formal proceeding like a hearing and no attorney is required to participate. The Regulatory Law Judges at the Public Service Commission are trained mediators and this service is offered to parties who have formal complaints pending before the Public Service Commission at no charge. If mediation is agreed to by the parties, the Commission will send notice of who the mediator will be and that person will set up the first meeting.

There cannot be a mediation unless both parties to the complaint agree to try in good faith to resolve the dispute. If both parties agree to mediate the complaint, the only information about the mediation that will be disclosed to the Commission is (a) whether the case has been settled and (b) whether the mediation effort was considered to be helpful. The Commission will not ask what was discussed during the mediation.

If the dispute is settled at the mediation, the Commission will require a signed release from the party filing the complaint before the formal complaint case can be dismissed. If the dispute is not resolved through the mediation process, neither party will be penalized for having taken part in the mediation and the formal complaint case will simply pick up where it left off.

Morris L. Woodruff
Secretary

STATE OF MISSOURI

OFFICE OF THE PUBLIC SERVICE COMMISSION

I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.

WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 22nd day of March, 2021.




Morris L. Woodruff
Secretary

MISSOURI PUBLIC SERVICE COMMISSION

March 22, 2021

File/Case No. EC-2021-0297

**Missouri Public Service
Commission**

Staff Counsel Department
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov

Office of the Public Counsel

Marc Poston
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@opc.mo.gov

Union Electric Company

Legal Department
1901 Chouteau Avenue
P.O. Box 66149, Mail Code 1310
St. Louis, MO 63166-6149
AmerenMOService@ameren.com

Vas Construction LLC

Ira Berkowitz
500 N. Skinner Blvd.
St. Louis, MO 63130
imberk@inlink.com

Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).

Sincerely,

A handwritten signature in dark ink, reading "Morris L. Woodruff". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

**Morris L. Woodruff
Secretary**

Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.